

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Elliot M. Hirsch,

Plaintiff,

Civil Action No. 21-12246 (FLW)

v.

**Amended Complaint and demand
for jury trial**

Adina Miles, Laurie Beda, Norma Tawil, Heshy Tischler, Amber Adler, Yeshiva of Flatbush Joel Braverman High School, Elisheva Yarimi, Nourite Maimon, Eve Scaba, Sarah Mizrahi, Yafah Sutton, Elizabeth Kairey, Isabella Khaimov, Lauren Dagmy, Miriam Sabzehroo, Raquel Sabzehroo, Sari Dana, Sherry Chera Halabi, Dalia Oziel, Deborah Shiloach, Eva Shammah, The Edmond J. Safra Synagogue Inc. and Rabbi Eli J. Mansour.

Defendants

INTRODUCTION

1. Plaintiff Pro Se, Elliot M. Hirsch, brings this action against the Defendants for their intentional malicious harassment/intimidation and defamatory campaign against me. The allegations herein of Plaintiff are based upon personal knowledge and belief as to his own acts and upon information and belief as to all other matters.

2. The reason the above-named individuals and entities engaged in these malicious/criminal acts was in order to severely oppress, harass, and intimidate me, for the ultimate purpose of extorting from me a Get to give to my wife, Elizabeth M. Kairey.

3. Elizabeth M. Kairey and I got married on November 5, 2013, and had our first and only daughter on October 9, 2016.

4. On May 30, 2017, which was soon after the conclusion of my first year in Seton Hall University School of Law and while living in New Jersey in my Oakhurst residence, Elizabeth decided to take our child and flee to the State of New York without my consent.

5. Soon thereafter, Elizabeth filed for divorce in Kings County Supreme Court of New York and has been heavily funded by affluent members of the Syrian Jewish Community allowing her to hire the most experienced, seasoned matrimonial attorneys money has to offer.

6. Elizabeth has been continuously viciously litigating against me in said Courthouse since June 2018. And we are still currently not legally divorced.

7. A Get is a piece of paper that must be physically deposited into the hands of a married Jewish woman in order for her to be considered divorced according to Jewish Law.¹

8. Articles posted on the internet define a Jewish woman who is “chained” to a dead marriage as an “Agunah”.² But according to true Orthodox Jewish Law, an Agunah is only a woman whose husband is unable to be located or whose husband has refused to grant her a Get in accordance with Jewish Law.

9. Unfortunately, most of the Orthodox Jewish world today has employed a corrupted version of Jewish Law and any husband who does not give his wife a Get when the wife demands it will be deemed a “Get Refuser” and labeled an “abuser.” But according to true

¹ <https://www.womenslaw.org/laws/religious/jewish-get-law-divorce-law/basic-info-about-jewish-divorce-law/what-get-or-sefer>

² <https://www.womenslaw.org/laws/religious/jewish-get-law-divorce-law/basic-info-about-jewish-divorce-law/what-agunah>

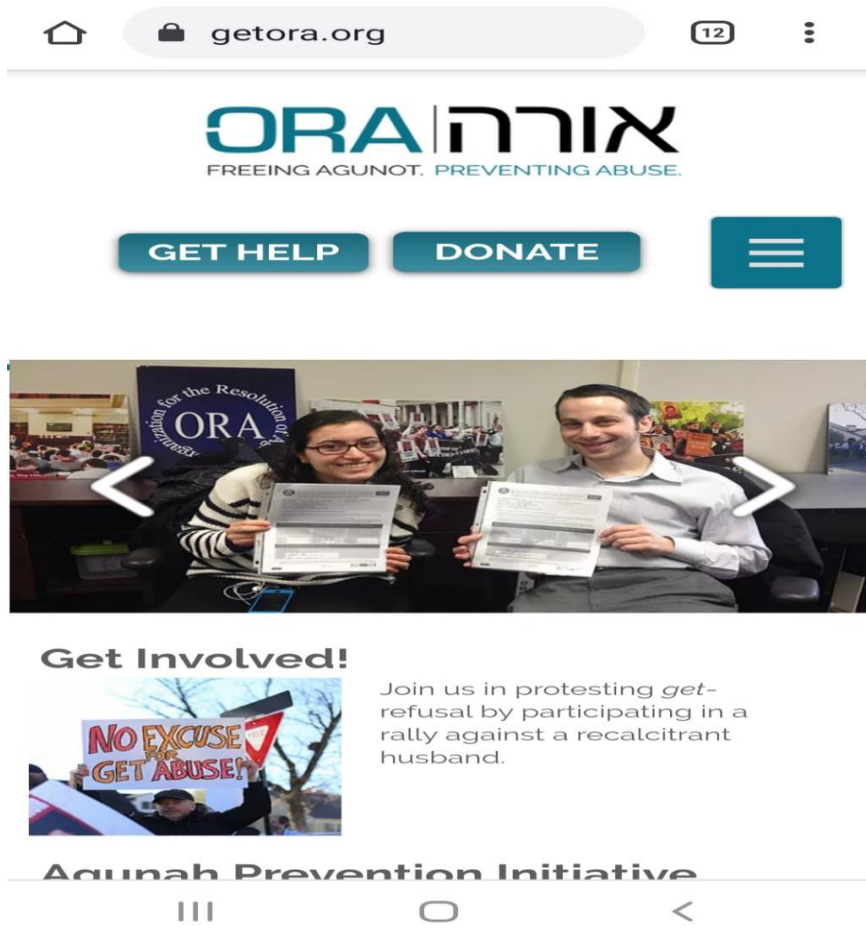
Orthodox Jewish law there simply does not exist the concept that a woman can simply demand a Get at any time, for any reason, and thereby rightfully request a divorce.

10. Soon after the events that occurred to me, several world-renowned news magazines posted articles regarding many of the allegations that are being set forth before this Court in this complaint.³

11. Most, if not all, of the factual allegations I am setting forth before this Court are already public knowledge and can be searched on several individuals Instagram accounts under @mexicanpacino0528 and hashtag #freeevet and #freeelizabeth and on YouTube under the term Syrian Jewish Divorce Get Mob.

³ <https://www.vogue.com/article/agunah-get-refusal-social-media-campaign-orthodox-women>

12. Many years ago, an organization was created called “ORA”, which solely focuses on helping women extract a Get from their husband. Their webpage cover page is:



13. Ora publicly shames and organizes protests against men whom they self-determine are “get refusers” hoping to get the men to give their wife a Get to avoid the public embarrassment.

14. Ora has a policy that as a condition precedent to organizing a public protest against a particular husband they first require a document signed by a Rabbinical Court known as a *Siruv*, which is a Hebrew term for contempt.(See Exhibit A attached hereto)

15. Most, if not all, of the *Siruv*'s that ORA receives are issued by Beth Din Of America, a Rabbinical Court that has many members who participate in both ORA and Beth Din of America, an obvious conflict of interest.

16. To ORA's credit, I have never seen an ORA protest where protestors were threatening violence, honking car horns, throwing rocks, causing civil disturbance, throwing eggs, and dumping animal feces and garbage bags on the "get refusers" property.

17. In the case at bar, mob members dropped garbage bags in front of my parents' home in Brooklyn, NY on March 11, 2021, at approximately 5pm.

18. The night before, random strangers entered our backyard dropping flyers off on our property in Brooklyn, NY with words "give Elizabeth a Get." That same evening, on March 10, 2021, a protest/riot occurred outside my permanent Jersey residence(house is owned by my father) in Oakhurst, NJ, where I have lived since June 2016.

19. On that same evening, March 10, 2021, from 8pm to 2am, a riot occurred outside the home of Dibo Hafif in Brooklyn, NY where rioters honked horns, damaged Hafif's vehicle, threw eggs and rocks at his house, vandalized his air conditioning units, and posted flyers with his cell phone number urging the crowd to bombard his phone cell phone with threatening and harassing messages in order that he grant his wife a Get.

20. Most of the Defendants in this case were in charge of creating, organizing and leading the riots and protests against me and there are likely others that were involved as well but I retain no evidence for that assumption.

21. A man named Abraham Manopla, who has an Instagram account named “mexicanpacino0528”, explicitly urged his followers to use “force”, egg houses, protest, and publicly shame me, Dibo Hafif and Jonathan Abtan until Gets were given.

22. Manopla explicitly stated that Rabbi Eli Mansour supported him, and that Mansour was directing his every move. It is important to note that Manopla had nothing to do with the creation of the #freelizabeth defamation campaign that will be described in the forthcoming complaint.

23. Manopla was using his platform to speak about the already public #freelizabeth campaign, which will be discussed later on in this complaint. Manopla did not advertise and organize either protest that was done against me, neither the one in Oakhurst, NJ, nor the one in Brooklyn, NY. Those protests were organized and formed by the other Defendants listed in this complaint. Once those protests were advertised Manopla simply advised his followers to attend them, which is why he is a joint tortfeasor.

24. The Defendants conspired to oppress, threaten, and intimidate me in the free exercise or enjoyment of my right of freedom of religion secured to me by the Constitution of the United States by expressly stating that they were engaging in these intimidation mob style tactics in order to extort a Get from me.

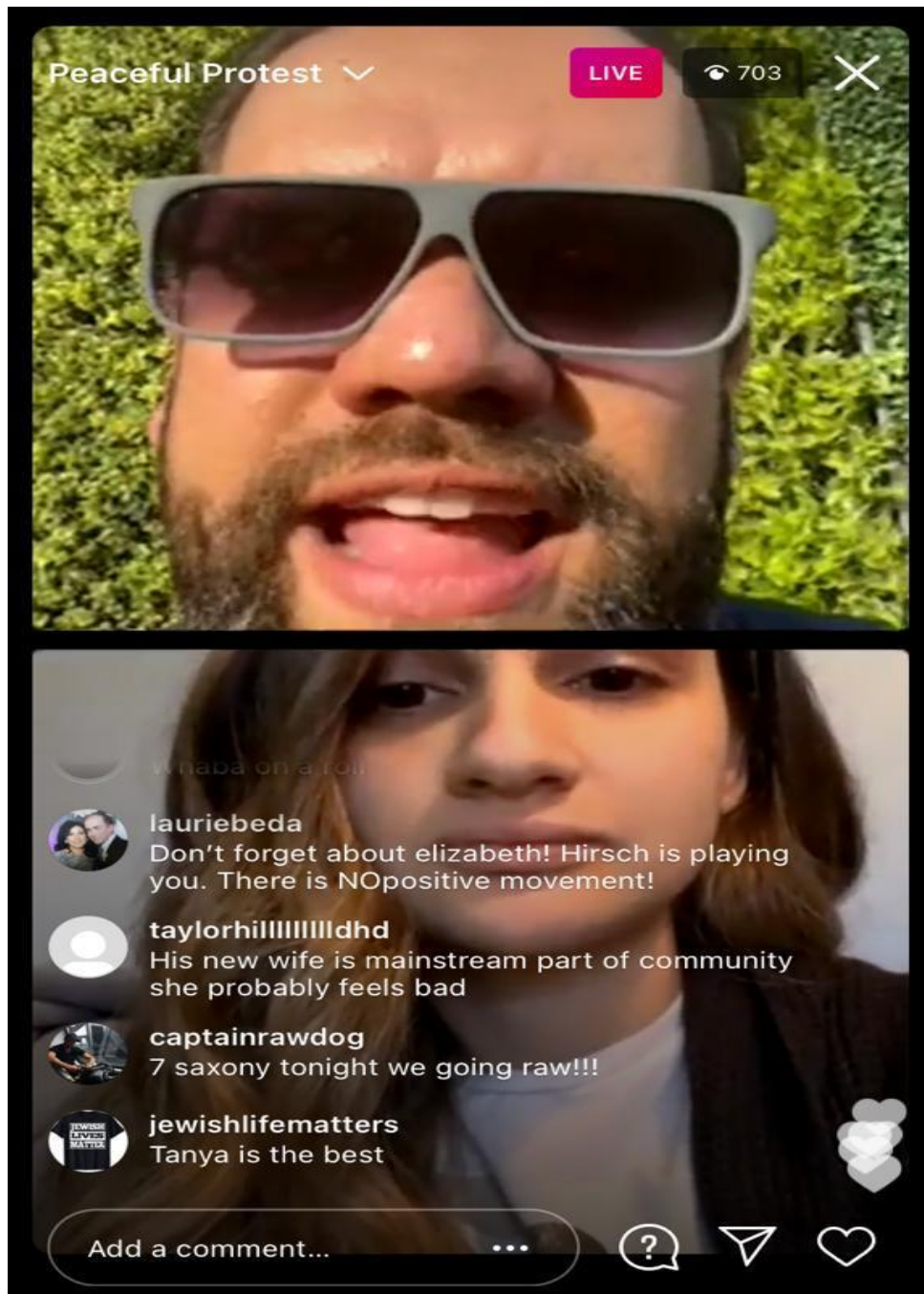
25. The main forum the Defendants utilized to conspire was on Instagram, an app that is one of the most widely used forums of social media in the world.

26. Abraham Manopla who lives in Oakhurst, NJ and is a member of the Syrian Jewish Community gained much fame due to his involvement in this so called agunah movement.⁴

27. Mr. Manopla, who calls himself “the Mexican pacino”, entertained thousands of followers on his Instagram account during the week of March 8 through March 11, 2021, updating them regarding my Jewish divorce controversy with my wife. But Manopla was in constant communications with the Kairey’s and Beda’s(cousins of Kairey) who were constantly advising him of the content to publish on his Instagram account.

28. Instagram has a feature where an account holder can commence what is called a “live” and it is basically a live streaming video where the account holder creates a title to the video, which is placed on the top of the screen, while speaking to his viewers. On the “live” the account holder can invite guests onto the live and the screen splits and has both screens available to view each person during this live video session as seen here:

⁴ See <https://www.heyalma.com/the-agunah-crisis-explained/>, <https://vinnews.com/2021/03/21/tonight-rally-planned-to-freenechama-from-get-refuser-dovid-wasserman/>, see <https://imageusa.com/free-from-chains-a-glimpse-into-the-aguna-get-crisis/>



29. Manopla had dozens of guests on his lives throughout the week of March 8-March 11 and continued to do so for several months after I gave my wife a GET on March 11, 2021.

30. Mr. Manopla, claiming to be only a reporter, would have guests come onto his live videos sharing information regarding updates as to whether or not I had given my wife a



GET as seen here:

31. Manopla titled the videos “hirsch update” as seen above and guests came onto Manopla’s show and advised him and the thousands of viewers who were watching the live as to whether or not I had given a GET and where proceedings were holding so that he could advise his followers whether or not to continue the coercion.

32. Although Manopla claimed to only be reporting he explicitly urged the viewers to go protest, egg houses, and publicly shame each and every man whom he arbitrarily decided was a “get refuser”. In fact, Manopla called himself “Judge Platty”, self-proclaiming himself to be some sort of Judge and repeatedly stated that me and other husbands were being summoned by the “Sephardic brotherhood” to his fictitious court of law.

33. Manopla stated to his followers that he is diagnosed with Bipolar disorder and that he loves taking drugs.

34. On March 10, 2021, Manopla realized that his actions were likely going to subject him and others to future litigation and he posted a “live” video expressing his concerns and asked his followers whether they should continue the “mob style” tactics.

35. Some of the above-mentioned Defendants were present at the riots at Dibo’s house and explicitly stated to the crowd of rioters that another round of protests were occurring the following day March 11, 2021, and thereby there is irrefutable evidence that these Defendants were acting in concert to extract a Get from Mr. Hafif and myself.

36. The Defendants will likely attempt to deflect blame to Manopla due to plethora amount of news articles posted online that claimed he was responsible for the extraction of the Get’s. However, as mentioned above, Manopla was not the organizer nor the creator of the “free

Elizabeth” chesed fund campaign that urged the public to harass and intimidate me for purposes of extorting a Get.

37. In fact, on a video I can provide this Court, Manopla and Mansour were on a “live” Instagram video and Manopla told Mansour that Mansour was really the reason this all happened since he put his name on Community News(an extremely popular Instagram account) and gave the go ahead to publicly defame me.

38. Interestingly, Manopla was in Mexico City the entire week of March 8- March 11, 2021.

39. On March 11, 2021, Hafif was arrested by the NYPD for allegedly abusing his wife and once that occurred the Syrian Mob, which had members in both New Jersey and New York, turned their entire focus on me.

40. I had absolutely no choice but to give a Get on March 11, 2021, in order to stave off the Mob from coming to my Brooklyn home where I exercise my parenting time with my child and where my parents and younger brothers live.

41. Additionally, if I did not give a Get that day I would have had another round of protests outside my Jersey residence. I simply could not withstand the intense and immense psychological warfare tactics that these Defendants perpetrated on me and my therapist that I am seeing now, due to the tremendous amount of emotional damages I suffered, advised me that he does not think any reasonable minded person could have withstood such coercion.

42. My entire family was being constantly harassed with communications pressuring them to urge me to give Elizabeth a Get. A protest was formed near my father’s pain management medical office, where he services primarily senior citizens, for the express purpose

of hurting my father's business and publicly shaming me with defamation accusing me of abusing Elizabeth Kairey.

43. My father allows me to live in his homes and I simply cannot afford to live anywhere else. I would be homeless if not for my dad.

44. I have been unemployed since June 2016 only occasionally driving as an Uber Driver. But my account was shut down for several years because my wife obtained an order of protection against me, which was subsequently dropped by the Supreme Court of New York, and I failed an Uber background check due to the order of protection.

45. Immediately after I gave the Get, Manopla and Mansour focused their efforts on Mr. Dibo Hafif and Mr. Jonathan Abtan.

46. Both of these other men, who had not given their wives a Get in 17 years and 5 years, respectively, gave their wives a Get within 5 days from when this Syrian Divorce Mob commenced their actions. Mr. Hafif was subjected to two riots and due to a looming third, gave his wife a Get on Sunday March 14, 2021.

47. Rabbi Hayim A. Arking and Rabbi Pinchos Rabinowitz, presided over the Get's of the two aforementioned men. My Get was presided over by Rabbi Yitzchak Yisraeli from Mil Basin, New York of the Sephardic Center of Mil Basin.

48. After apprising themselves of the facts that have been prior mentioned above, Rabbi Rabinowitz invalidated both the Get of Mr. Hafif and Mr. Abtan due to illegal coercion(Jewish Law invalidates a Divorce given under duress in most circumstances).

49. But, Rabbi Yitzchak Yisraeli has refused to invalidate the Get I gave and instead issued two separate public rulings, 1) falsely claiming that no husbands were coerced to give a Get during the mob riots, a fact which is now already disputed by other Rabbinical Courts and 2) issued a ruling claiming the Get I gave was done without coercion and he even wrote that he only spoke with those involved in pressuring me to give a Get and based his ruling on only their words without independently investigating the matter.

50. Yisraeli further falsely accused me of all sorts of abusive behavior towards my wife, believing all of the defamation that these Defendants stated about me, and claimed that I am solely interested in tormenting her and based these accusations on outright hearsay.

51. Jewish Law, like United States Law, forbids a Justice to issue final rulings ex-parte and Rabbi Yisraeli's actions evince the unfortunate situation that plagues the Orthodox Jewish communities; namely, so-called Rabbi's corrupting Jewish Law.

52. I am bringing Orthodox Jewish Law to the attention of this Court to forestall potential arguments these Defendants will make, falsely claiming that they were simply engaging in religious behavior. Orthodox Jewish Law forbids, for the majority of cases, coerced divorces. Additionally, Orthodox Jewish Law obligates Jews to abide by the law of the land they live in. These Defendants violated both of the foregoing commandments and if they kept Orthodox Jewish Law this story would never have transpired.

53. About a month or so after the Get's were extorted from myself, Abtan and Hafif, Manopla commenced another "live" with a man named Saul Harari. Harari told Manopla that he has had enough with the Mob and that he was "out of the mob."

54. Manopla indeed agreed that the Mob tactics were not wise.

55. Harari stated, “who gave us the right to harass Elliot Hirsch”. Harari also stated, “who gave us the right to harass Elliot Hirsch’s father”, thereby providing me with irrefutable evidence that the mob acted with malice and understood what they were doing.⁵

56. On said video, Manopla acknowledged that I was harassed and coerced to give my wife a Get and stated to Harari that that is why Manopla has now “backed out” of the movement.

57. This video was publicized to thousands of people thereby further exposing what happened to me and evidencing the general consensus among the public that what occurred to me was blatant criminal extortion!

58. Manopla continuously told his crowd that the Syrian Jewish community is not Antifa or Black Lives Matter and that they cannot engage in illegal activity that would bring shame to their community as they are religious Orthodox Jews and that is not how Jews should behave. I completely agree that the actions of these defendants brought tremendous shame to the Jewish nation, and I advise the Court that the actions of these Defendants should not be taken to reflect on the entire Jewish Nation, especially the Orthodox Jews. The Defendants are anomalies.

59. If the Court is wondering how the NYPD allowed such riots to take place there is one reason for that; namely, the Flatbush Shomrim Watch group.

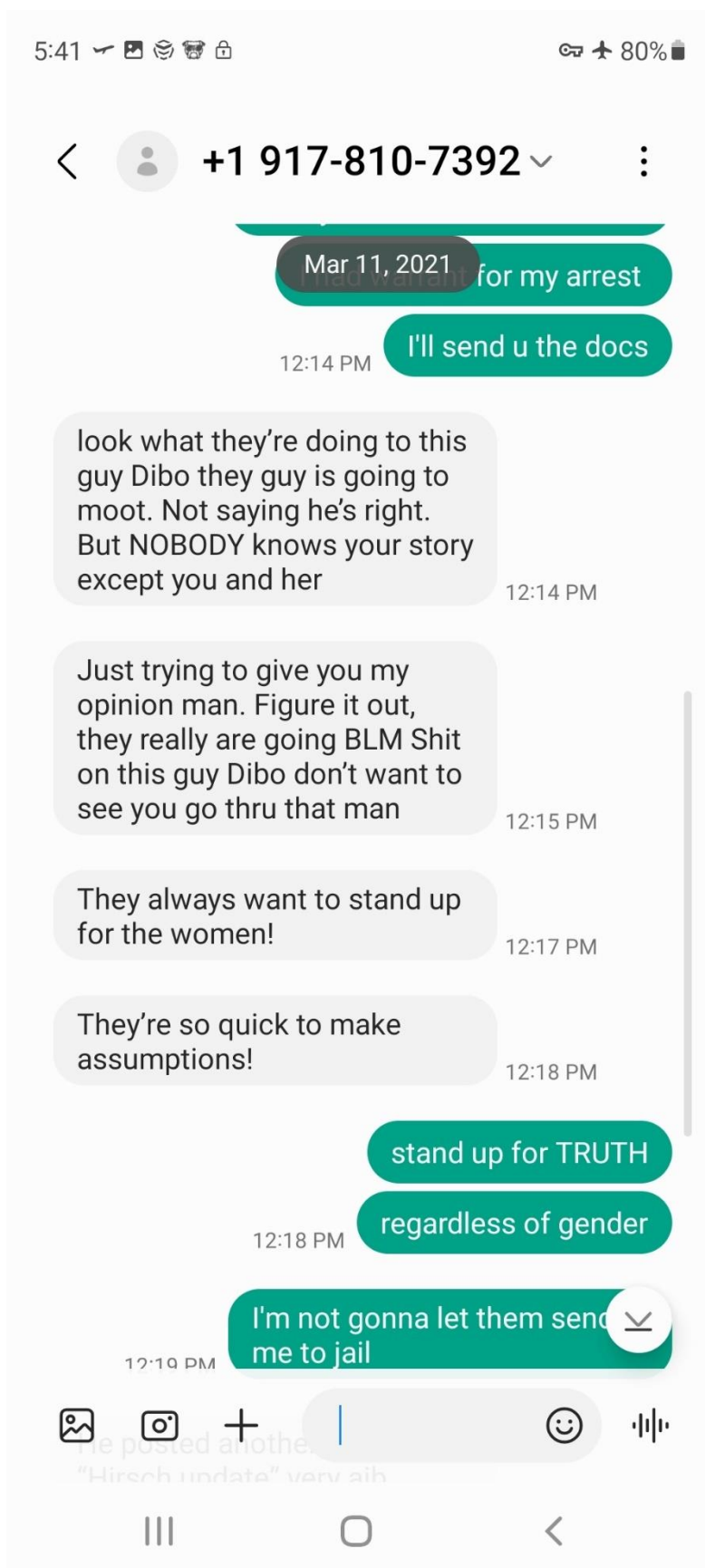
60. Shomrim is a private organization funded by Orthodox Jews who have individuals patrol neighborhoods for the safety of its citizens.

⁵ See <https://www.youtube.com/watch?v=DeQ3uiWS1LA>

61. Shomrim members were in direct contact with the NYPD and conspired with the NYPD and ordered them to stand down and allow the riots to take place.

62. On the night of March 11, 2021, at approximately 6pm, my brother, Judah Hirsch, who was home at my parent's home in Brooklyn, NY that night, saw one police car outside the residence.

63. The police informed my brother that they were ordered to stand down and allow rioters to egg our home. I was not going to allow the mob to do to my home what they did to Dibo's home, see here below text exchange between some random stranger who got my number from the Defendants and texted me on March 11, 2021:



64. After I gave the Get I went to my parents Brooklyn residence and encountered that one police car.

65. I informed the police that I had given the Get and they thanked me profusely. I have a video of said interaction. To say that I was relieved that night is an understatement.

66. In a country where religious freedom is widely acknowledged as one of the core tenets of our founding fathers, I am shocked, to say the least, that law enforcement permitted dangerous, illegal, violent riots, that occurred solely to coerce religious protected activity. The Defendants behavior is not protected by the First Amendment.

67. The NYPD 61st Precinct supplied only one police car each night, March 9, 2021, and March 10, 2021, for a riot that occurred in their jurisdiction that had over 1000 people.

68. They likewise only had one police car at the protest organized near my dad's office on March 11, 2021. And the NYPD was on notice for all of the protests as I called the 61st precinct to notify them about the protest on Ocean Ave and Mr. Hafif likewise notified the NYPD about the planned riots outside his home.

69. New York Law, like New Jersey law, requires organizers to secure permits prior to gathering and commencing a protest. Additionally, special permits are required for loudspeakers, which were used.

70. I am absolutely positive that permits were not secured for any of the riots and protests that took place in New Jersey and Brooklyn, New York.

71. In New Jersey, the Ocean Township Police issued motor vehicle summonses and brought 10 officers to disperse the illegal protest outside my home.(See Exhibit B attached hereto).

72. Additionally, one of the officer's present at the protest spoke to Manopla on one of the live videos and the officer told Manopla, "this is not peaceful. When they are yelling and honking the horn, this is not called peaceful. Leave him alone and leave the area. This has nothing to do with you guys."

73. At the Get proceeding I explicitly advised the Rabbis involved that Mr. Harry Adjmi and Rabbi David Ozeri assured me that once I gave the Get they would issue their own public video advising the entire Orthodox community to leave me alone and indeed, after I gave the Get, these two highly popular and authoritative figures issued said video and there were no further mob riots or protests outside any of my father's residences or businesses.

74. There are hundreds, if not thousands, of potential witnesses I could bring to trial to verify the allegations I have set forth before this Court and it will be impossible for these Defendants to deny the factual allegations I have set forth in this Complaint.

75. In summary, the Defendants committed criminal acts and civil torts under the facade of Orthodox Jewish religious activism. This is the main reason they were able to gain the popularity of the masses and incite such violent hatred and disorderly conduct towards me and my family; namely, they created the impression that they were acting in the name of religious justice. However, these Defendants are vigilantes and committed illegal acts, both criminally and civilly and both according to State, Jewish and Federal law.

76. I ask this Court to punish the Defendants with great severity as their actions were wanton, malicious, and caused me permanent reputation and emotional damage and cannot be countenanced in a civilized society in this Country.

77. The injuries and damages suffered by me were direct and intentional consequences of the acts of the Defendants. I suffered significant psychological and emotional injuries as a result. Defendants must be held accountable. And I file this Complaint to do just that, and to help ensure that what took place during the week of March 8-18, 2021, and the months after, never happens again to any other person acting in accordance with their religious beliefs in the United States of America.

78. I believe the Defendants, besides for Elizabeth Kairey, are guilty of violating 18 U.S. Code § 875, 18 U.S. Code § 2261A, and 18 U.S. Code § 247. And I have notified the FBI about the actions of these Defendants speaking to member ID 59745 of the FBI national threat operations center. I would request from the Court, after reading this complaint, that if it believes the Defendants are guilty of violating said U.S Codes, that it refers this case to the FBI and/or U.S Department of Justice for prosecution of the criminal aspects of Defendants actions.

JURISDICTION AND VENUE

79. Plaintiff brings this suit pursuant to 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, which is a diversity jurisdiction case.

80. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

81. Plaintiff, Elliot M. Hirsch, resides at 7 Saxony Drive, Oakhurst, New Jersey 07755. Plaintiff's telephone number is 917 750 0418 and email address is Elliothirschlaw@gmail.com.

82. Defendant Laurie Beda permanently resides at 441 Quentin Road, Brooklyn, NY 11223.

Defendant Norma Tawil resides at 2039 East 8th street, Brooklyn, NY 11223.

Defendant Amber Adler permanently resides at 1775 east 13th street Apt# 5F, Brooklyn, New York 11229.

Defendant, Heshy Tischler's business address is 5318 16th ave, Brooklyn, New York, 11204.

Defendant Elisheva Yarimi resides at 1452 E 12th St, Brooklyn NY 11230.

Defendant Yeshiva of Flatbush Joel Braverman High School is located at 1609 Ave J, Brooklyn, New York 11230.

Defendant Adina Miles resides at 1416 E 16th St, Brooklyn, NY 11230-6608.

Defendant, Eve Scaba resides and/or has a place of business at 1966 East 21st street, Brooklyn, New York 11229.

Defendant Nourite Maimon resides at 14 Manhattan Court, Brooklyn, New York 11223.

Defendant Lauren Dagmy resides at 1745 East 7th street, Brooklyn, NY 11223.

Defendant Sarah Mizrachi resides at 1653 Ocean Parkway, Brooklyn, NY 11223.

Defendant Yafah Sutton resides at 1953 East 24th Street, Brooklyn, NY 11229.

Defendant Elizabeth Kairey, reside at 1531 East 3rd street, Brooklyn, NY 11230.

Defendant Isabella Khaimov resides at 31967 Kenyon Cir, Solon, OH 44139.

Defendant The Edmond J. Safra Synagogue Inc. is incorporated in New York and its place of business is located at 1801 Ocean Parkway, Brooklyn, New York 11223, LEI# 549300NFNQBMZN6OFK59.

Defendants Miriam Sabzehroo and Raquel Sabzehroo reside at 1130 E 27Th St, Brooklyn, NY 11210.

Defendant Sari Dana resides at 1925 E 5Th St, Brooklyn, NY 11223.

Defendant Sherry Chera Halabi resides at 2064 Ocean Pkwy, NY 11223.

Defendant Dalia Oziel resides at 7147 Dogwood Creek LN Dallas, TX 75252.

Defendant Deborah Shiloach resides at 2315 Ave S, Brooklyn, New York 11229.

Defendant Eva Shammah place of business is 920 Avenue L, Brooklyn, NY 11230.

Defendant Rabbi Eli J. Mansour(head rabbi of Edmond J. Safra Synagogue Inc.) resides at 1970 E 14th St, Brooklyn, New York 11229.

STATEMENT OF CLAIM

83. The incidents that give rise to this action took place on WhatsApp, and Instagram, two separate social media networking programs, on March 8, 9, 10, and 11 in the year 2021 and in Brooklyn, NY, on the corner of Ave P and Kings Highway at Ocean Ave, adjacent to a park named “Corporal Wiltshire Park” on March 11, 2021, at circa 12:00pm and at 7 Saxony Drive, Oakhurst, NJ 07755 on March 10, 2021, from approx. 8:30pm to 11:00pm. I was not present at either protest as I was in hiding. However, the threatening messages that were made at the illegal riots and on Instagram were sent to me via electronic means; namely, Instagram and WhatsApp,

while I was present in the State of New Jersey. Accordingly, a substantial part of the events giving rise to this claim occurred in this Court's jurisdiction. Many of the defamatory comments made about me still exist on the internet to this date. Furthermore, the Defendants all knew that I live in New Jersey and intentionally posted their comments and communications with the express intent that they reach me in this State of New Jersey. The Defendants explicitly stated that they were engaging in these acts for the express purpose of causing me such severe emotional distress that I would have no choice but to go to Beth Din(Jewish Rabbinical Court) to give my wife a Get and thereby these Defendants subjected themselves to the personal jurisdiction of the State of New Jersey⁶.

FACTS

I. DEFENDANT LAURIE BEDA

84. Laurie Beda is the sister of Elizabeth Kairey's mother, which makes her my wife's aunt.

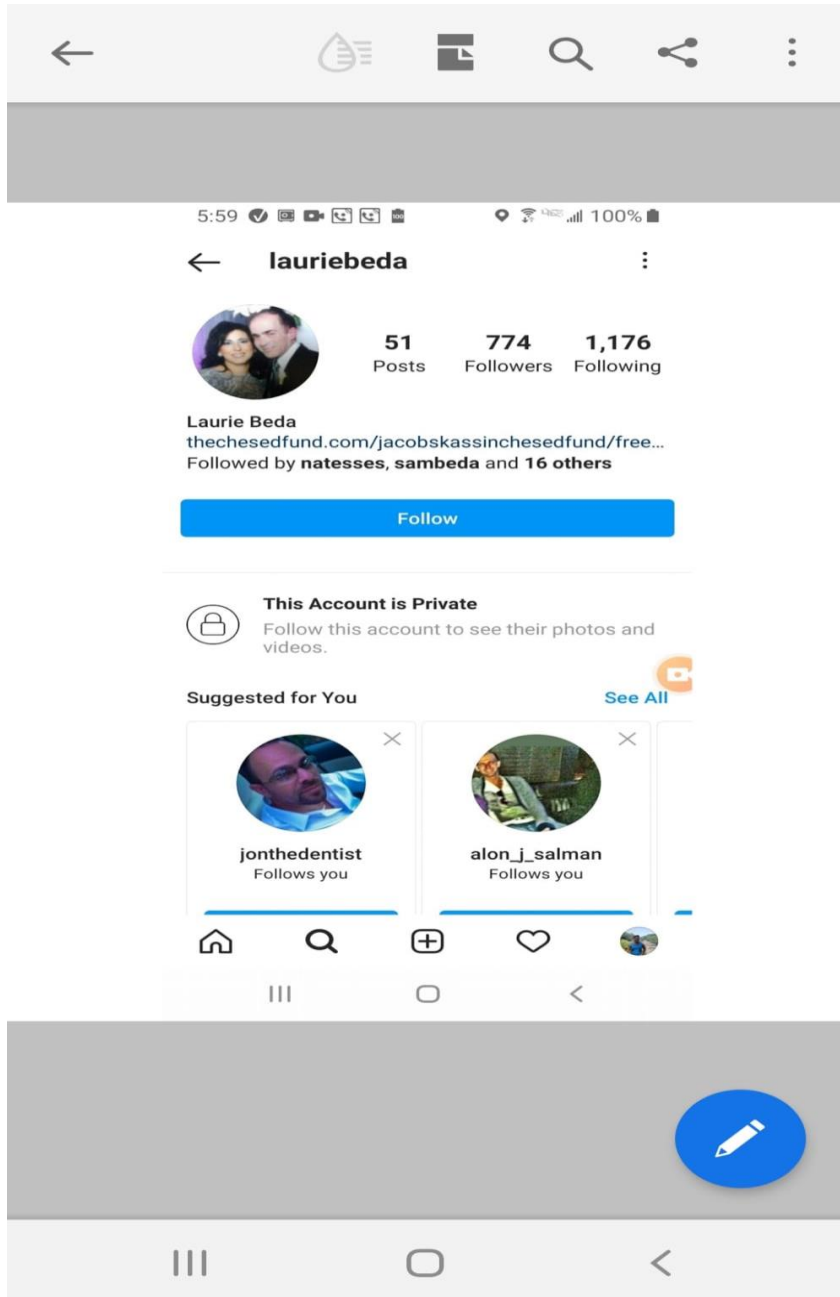
85. Laurie Beda had and still retains an Instagram account under the name "lauriebeda."

86. Her picture, her standing next to her husband Leon Beda, is there as the icon photo.

87. As of the time of the first complaint filed here in this Court, Laurie Beda still had posted on her Instagram page a link to a website called "the chesed fund". The exact link she

⁶ see: <https://law.justia.com/cases/federal/district-courts/new-jersey/njdce/3:2016cv06572/338903/15/>)

posted was <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth> see here:



88. The webpage that Laurie Beda posted on her Instagram page was a “charity” campaign for my wife Elizabeth Kairey. Said webpage was rendered defunct after my wife was able enrich herself, by virtue of its contents being publicized and spread by many individuals, including but not limited to Laurie Beda, with approximately \$128,000 in less than 72 hours(the webpage has been reopened on or about February 14, 2021)

89. On said webpage a picture was posted of my wife Elizabeth Kairey adjacent to our daughter, whose face was blotted out(I found that offensive). Obviously, the purpose of the picture posted was to draw public sympathy for Elizabeth as she was claiming to be a single mother. In reality, my wife unilaterally decided to leave the State of New Jersey in May 2017, take our child to New York without my consent, and forbid me from seeing our child, forcing me to file a motion for parenting time in Superior Court Monmouth County New Jersey, thereby causing me to lose my position as a judicial intern for Presiding Justice Kathleen Sheedy of the Family Law division due to conflict-of-interest concerns.

90. Said webpage was published on March 8, 2021, on the Chesed Fund organization webpage and was created by a Jewish Synagogue called Edmond J. Safra Synagogue located in Brooklyn, NY. My wife and her family are members of said synagogue. On said webpage my name was stated throughout the comments section posted on the webpage and referenced me as “he” throughout the description on the webpage. It is indisputable that I was the subject of the description on the webpage. Moreover, once the link was published I received dozens of messages advising me that I was the subject of a webpage campaign.

91. The method that the Chesed Fund website operates under is that these fundraiser campaigns offer donators the ability to post comments when donating.

92. The comments section is an optional feature of the Chesed Fund, and each particular fundraiser page has the option of disabling said function. Moreover, the comments posted are controlled by the webpage creator and can be deleted immediately or left up there indefinitely solely at the discretion of the fundraiser who is controlling the webpage.

93. Accordingly, the webpage creator and those that published its content, such as Laurie Beda, should be held accountable for all comments that were made and left on the website.

94. Several comments posted on said webpage contained threats of violence directed at me and incited hatred towards me and my family.

95. The webpage creator was closely monitoring all comments posted throughout March 8- March 11, as some friends of mine made comments on donations they made, and the webpage immediately removed them because they expressed support for me. But the comments threatening me with violence were not removed until after I gave a Get.

96. Even after I gave the Get, the webpage was still alive(see below top left corner which was the date I saved this evidence- March 13, 2021) and the fundraisers then issued a disclaimer not to post negative comments as seen below:

\$2,601

97. Once Elizabeth received a Get from me the website utilized the feature of disabling the ability for donators to comment, thereby proving they intentionally left the comments feature open so that the threats of violence could be transmitted to me. Additionally, it is completely possible that the webpage creator was the one who made those threatening posts. Either way, they are responsible for the content posted.

98. On March 9, 2021, Mr. Jason Kessler, an acquaintance of mine, donated \$1 and made a comment that urged Elizabeth Kairey to fire her attorney Jay R. Buttermann. The website immediately deleted the comment. Hence, I have irrefutable evidence that the site was being actively controlled by the Edmond J. Safra Shul and decided which messages to allow to be published and which not to be.

99. The webpage accused me of , *inter alia*, never paying any child support.

100. The website also stated that I appealed every decision of the civil court(referencing the divorce action between Elizabeth Kairey and Elliot Hirsch index number 53206/2018 in Supreme Court Kings County).

101. Comments were made on this website stating, “let’s make a physical gathering and get the get”. Another comment posted stated “ wow, let’s do that, good idea, he’ll regret every day he held her back, Where do we go? He’ll get scared and give it(the GET) immediately.”

102. Another comment posted stated “elliot you are evil”. Another comment stated, “boycott Dr. Jonathan Hirsch.”

103. To emphasize the spuriousness of the comments section on this webpage, there was a donation in the name of Stuart Husney, my mother's brother and Elliot Hersch(spelling my name wrong).

104. I will testify under oath that I did not donate to this campaign and Stuart Husney, who is also willing to testify, also did not donate to this campaign webpage.

105. The webpage creators falsely made comments in order to further their objective that even my family members were opposed to me and did not support me in my refusal to give my wife a GET.

106. My wife's attorney Jay R. Buttermann has recently confirmed that his client received the money and approved the webpage. Moreover, according to a sworn document my wife signed, "her friends and family" were the ones who opened up this webpage. Laurie Beda and Norma Tawil are family members of Elizabeth Kairey and are directly connected to spreading the contents of said webpage and Elizabeth Kairey will have no choice but confirm my factual allegations at trial since she must testify under oath.

107. Besides for Laurie Beda's publishing the aforementioned webpage which contained much defamation and threats of violence directed specifically at me, on March 10, 2021, Laurie Beda, further engaged in a deliberate malicious campaign of harassment and intimidation via Instagram posts she made on her main page and on one of Manopla's live Instagram videos.

108. Said posts galvanized a mob of illegal protestors to come riot and protest outside my home at 7 Saxony Drive Oakhurst, NJ 07755 on March 10, 2021, and my father's medical practice on March 11, 2021, located at 2136 Ocean Ave, Brooklyn, NY 11229.

109. On March 10, 2021, during an Instagram live video Manopla commenced, which he labeled “peaceful protest”, Laurie Beda, made numerous posts/comments on this live video, which had approximately 800 people viewing it and it is still posted up on Manopla’s Instagram and has received an addition several thousand views.

110. There is no doubt that Laurie Beda is the person who made the comments on the live video entitled “peaceful protest” as I have irrefutable evidence of videos that were posted publicly at the Brooklyn protest where Laurie publicly stated many truthful details about my divorce controversy with my wife. Additionally, Laurie even came as a representative of my wife to an arbitration proceeding back in April 2018. And lastly, the icon photo of Laurie Beda, with her picture, cements her as the one who made the comments.

111. Laurie Beda made the following comments on this live video titled “peaceful protest”.

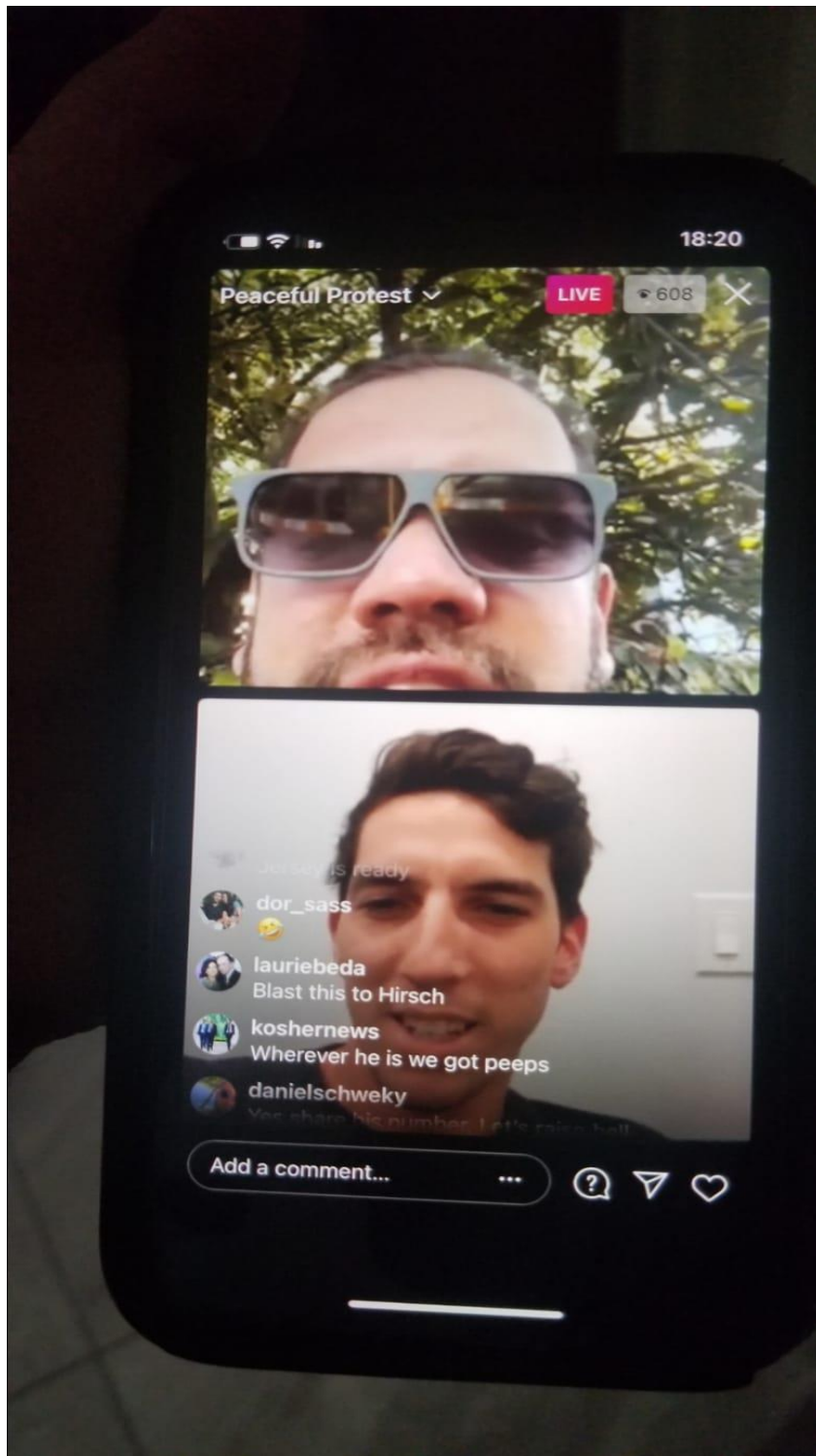
A Don’t forget Elizabeth! Hirsch is playing you. There is no positive movement.

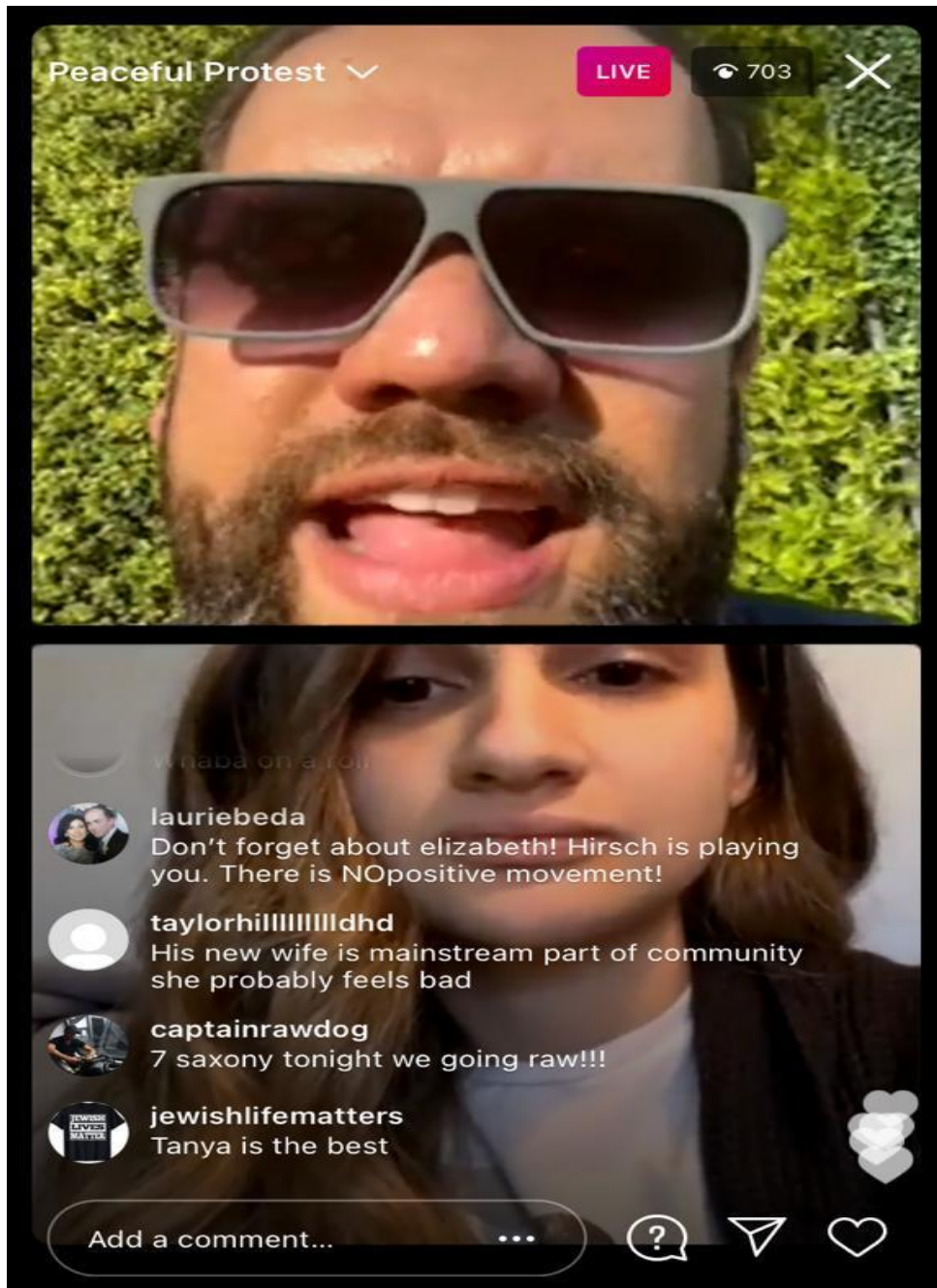
B. Blast this to hirsch(which someone else responded with : Yes, share his number. Let’s raise hell)

C. Nothing from Hirsch.

D. I am credible.

as seen here below :



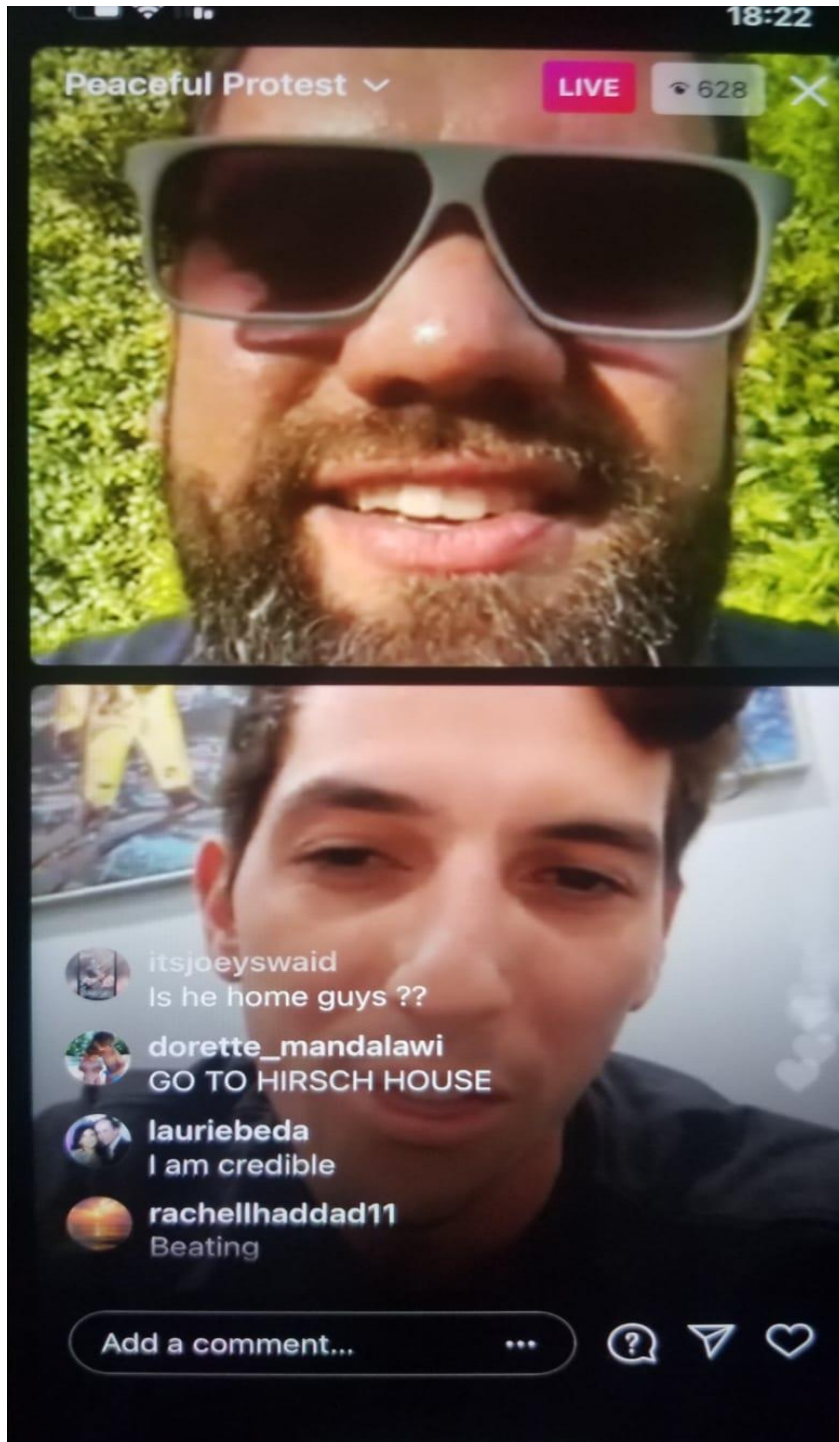


112. Here are some of the other comments people made on the live video that give Laurie Beda's comments more context:

A. Laurie Beda is credible. She says no movement.

- B. Is he home guys?
- C. Beating
- D. Go to Hirsch house.
- E. Wherever he is. We got peeps.
- F. Lets go 7 Saxony Dr. tonight.
- G. There is no movement.
- H. Well boat his phone
- I. Yes share his number. Let's raise hell.
- J. 7 Saxony tonight. We going raw.(raw means we are going crazy)

as seen here below:

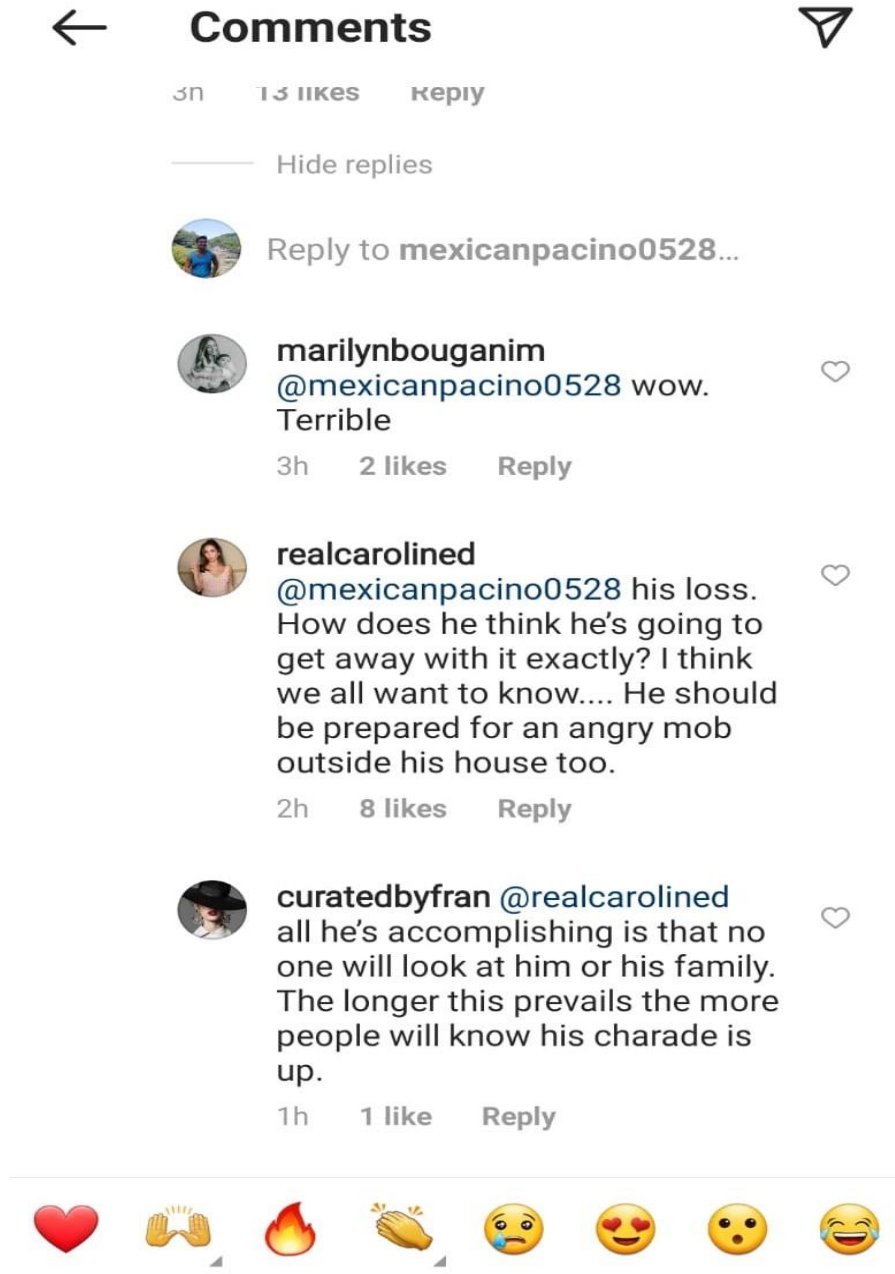


113. I was able to download most of the live video that was titled “peaceful protest.” However, the comments people made during the live video do not get saved on Instagram. But I received screenshots of the above-mentioned comments from people who sent me them via

WhatsApp. The people sent me these screenshots because Laurie Beda advised the crowd to “blast this to hirsch”. And indeed, I received the threatening messages from numerous people. Also, because of Laurie Beda, my phone was “boated”, meaning, I received hundreds of harassing messages and calls from various random strangers harassing me and threatening me with violence to give my wife a GET. Because of Laurie’s “blast this to hirsch” message, I was therefore on notice of the planned mob of rioters coming to my personal residence and I fled to the Ocean Township Police Department.

114. Due to Laurie Beda’s public statement stating, “blast this to hirsch”, I received notice about this video and the planned protest at my home 7 Saxony Drive Oakhurst, NJ 07755. My personal address and phone number was shared to over 1000 people. Additionally, because of Laurie Beda, I received dozens of texts advising me to leave town because I was going to get a beating as shown in the picture above. I had numerous random numbers harassing me to give my wife a GET because of Laurie Beda’s comment, “there is no movement” and “blast this to hirsch.”

115. I also received messages on Instagram which were posted publicly advising me “he should be prepared for an angry mob outside his house too”. These posts just certify that the people knew they were a mob as seen here:



116. Extremely important to note is that during this live video Mr. Manopla was reading the comments and telling the viewers to **NOT** go to my home at 7 Saxony Drive. He repeatedly asked the mob to not to go to my home because someone informed him that there were positive developments in the case.

117. This unnamed informant was obviously in contact with my wife because there is no other person in this world who can receive the Get in order for my wife to be divorced. I must place it into her hand.

118. Later on, that evening, Manopla changed his mind, and made a new live and urged people to go to my home once he saw that people were there and that's why he is only a joint tortfeasor who is not required to be included in this lawsuit under the rules of compulsory joinder.

119. However, during the prior live video which I can provide to this Court, it is evident that Manopla was continuously reading the comments posted by Laurie and others that were explicitly advising the crowd to mob my home that night. (all viewers are able to see the comments posted during the live).

120. Laurie Beda's actions culminated in an illegal riot/protest outside my home at approximately 930pm on March 10, 2021.

121. A police report was filed with the Ocean Township Police Department. As stated in the police report #21OT04466, 10 Police officers were needed to disperse the illegal protest. As stated in the report, the officers heard the crowd chanting "give her a get" and my name and Elizabeth's name being yelled.

122. According to the report, the officers observed numerous vehicles blocking the roadway and cars blowing their horns, causing a civil disturbance, waking up the block and obstructing the flow of traffic.

123. The officers heard the crowd chanting the names "Elliot and Elizabeth."

124. There was a field reporter, named Michael Sabon Salomon, who was conversing with Manopla on a live while the riot/protest was taking place.

125. Mr. Salomon informed Mr. Manopla that people were “smashing cars” and “demanding” that I give my wife a *GET* and trying to break my doors down. I was in fear for my life while watching this video and I still have tremendous PTSD, trauma and anxiety from that evening.

126. Before the protestors arrived at my home I fled to the Ocean Township Police Dep. for my safety since as mentioned above I received notice. I was at the police station for approximately 3 hours. Once the officers were able to disperse the protestors one of the responding officers came back to the precinct and spoke with me. I advised him I wanted to apply for an order of protection against my wife.

127. I got on the phone with a Judge and the Judge granted me a temporary order of protection against my wife. I explained to the Judge how the protestors were there to give me a beating and force me to give my wife a *GET*. The Judge understood the situation and even he realized that I had no choice but to give my wife a Get.

128. The judge actually advised me to give my wife a GET and said how are you going to stop these people from coming to your house every night?

129. I understood his position because there was no stopping the mob from coming to my home every single night.

130. Till this day I am unsure as to what measures I could have taken in order to protect myself from this mob. Was there anything I could have done to prevent these Defendants from extorting the Get from me? I called the FBI, and they didn't get involved.

131. The police offered me a safe house to sleep in that night, which I declined, because I didn't trust the police since I knew how connected these affluent Syrian Jews are and I saw what was happening in New York to Dibo Hafif, how the cops were not protecting him at all.

132. I called several friends of mine asking them if I can sleep by them, but they were all afraid that the mob would find out where I was staying and would come to their homes.

133. In fact, at around 2pm on March 10, 2021, I called a friend of mine, whom I knew has a home near Albany, NY and asked him if I could sleep by him March 10, 2021.

134. This friend's name is Shmuel Hiller.

135. Shmuel advised me that there was no issue at all, and I could stay at his home and to call him at around 7pm that night for directions to his house.

136. When I called Shmuel later, he ignored my call. I called him 10 times and he ignored all 10 calls.

137. 2 months later I called Shmuel and asked him why he ignored me on March 10, 2021.

138. Shmuel advised me he was watching the news and was made aware of the mob protests and was afraid that if I slept at his home the mob would follow me to Albany and he was fearful for his property and well-being.

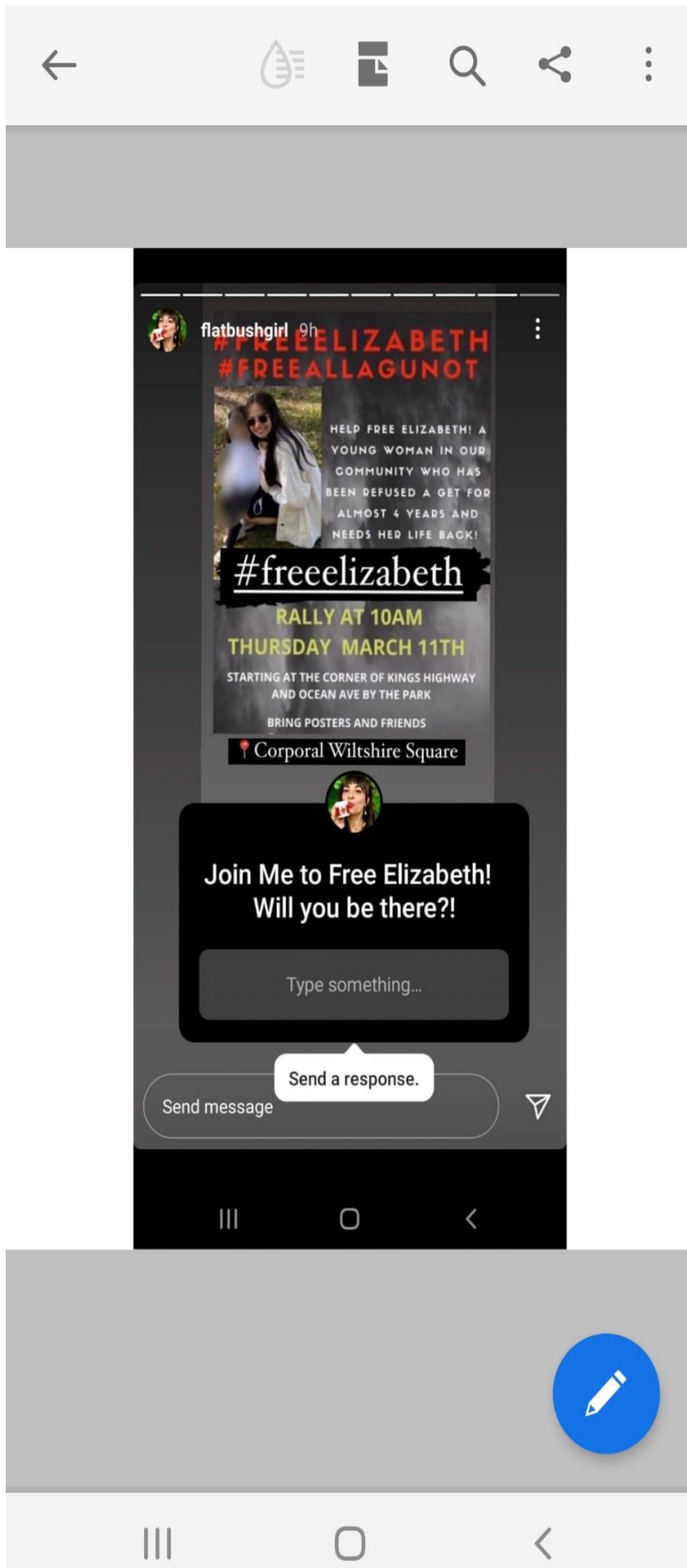
139. Shmuel advised me he would testify for me at trial.

140. I could not sleep home that night for I was in fear for my life since I was receiving hundreds of calls and texts from random strangers telling me they had my address and that I

“better lock my doors tonight”. Luckily, I found a different friend of mine willing to let me sleep in his house in Long Branch, New Jersey and till this day no one besides him knows where I slept that night.

141. On March 11, 2021, an illegal protest took place at the corner of Kings Highway at Corporal Wiltshire Park. My father’s medical practice is located down the block from said park at 2136 Ocean Ave, Brooklyn, New York 11229.

142. The protestors intent was to come down the block to my father’s office as evidenced by the flyer with a picture of my wife and daughter for said protest as seen here :



143. On March 11, 2021, in Brooklyn, New York at Corporal Wiltshire Park, Laurie Beda participated and co-led an illegal protest consisting of approximately 60-80 people.

144. Numerous cardboard signs stated, “Free Elizabeth” and “withholding a get is abuse”, to which, Laurie was standing and supporting those holding the sign.

145. Only one police car is shown in videos of the protest, with zero officers outside controlling the unruly protestors who were spewing threats directed at me and my family.

146. I personally advised the police at the 61st precinct the prior day, March 10, 2021, that an illegal protest was planned against me, and the protestors were going to go to my father’s medical office.

147. The protest was certainly illegal as the New York City rules require permits for protests to be requested at least 2 weeks prior to a protest in addition to a separate permit for loudspeakers, which were used at the protest.(these rules might have changed since March 2021)

148. The protest was only organized after the chesedfund campaign was launched on March 8, 2021.

149. There is no question that I was the subject of the cardboard messages and all the threats stated at the protest as evidenced by Heshy Tischler’s public video he posted on his Instagram account where he states while at the protest “We are at a demonstration. This guy Elliot Hirsch did not give a GET. And we are here demonstrating.” Said video Heshy made is still up on his Instagram page as of the date of this complaint.

150. There were two separate women, Adina Miles, and Amber Adler, who were using a loudspeaker to scream such things as “ no get , no peace” at the protest and Laurie Beda can be seen standing next to them at the protest, obviously supporting the message. Protestors also screamed “abuser on the block.”

151. Adina Miles posted a thank you on her Instagram stating, “Elizabeth’s family(Laurie Beda and co.) and friends, who were ready to march to Elizabeth’s ex-husbands place of residence and workplace to ask for her freedom”. Accordingly, they admitted that they were conspiring together and that they were going to come to my home if I didn’t give them what they demanded.

152. Rabbi David Ozeri came to the protest to attempt to dispel the protestors and order them not to come to my father’s medical practice down the block. He pleaded with the protestors, specifically Laurie Beda, not to take the protestors to my father’s office.

153. Laurie Beda, while leading a group of protestors, screamed in a threatening tone, with the protestors around her, “if he doesn’t give the GET today, we will be there(pointing to my father’s office) tomorrow. And then their house (my home and my father’s home) tomorrow.”

154. I received this video of Laurie Beda stating the aforementioned threats while in the State of New Jersey and Laurie Beda was aware that she was being recorded and with actual malice stated these threats.

155. The Rabbi then stated that he would help Laurie Beda lead the protest the next day if I did not give the GET that same evening, March 11, 2021.

156. Rabbi David Ozeri then stated to Laurie, “this is the closest we ever got” and “this pressure is working” and Laurie Beda responded, “only because of this”. Accordingly, Laurie’s actions were intentional and maliciously directed at causing me severe and extreme emotional distress for the ultimate purpose of extortion.

157. Then Laurie publicly mentioned a former i-card and order of protection that was issued against me in New York State, evidencing her knowledge of details that only my wife could have shared with her.

158. The Rabbi did his best to keep the protestors from coming down the block to my father’s medical office that day and in fact the protestors did not come down the block to my dad’s office because the Rabbi promised them I would give the GET that night.

159. Upon information and belief, Laurie Beda advised people to call my dad’s office line number and bombard his office lines with phone calls with people screaming “give a get” to my dad’s secretaries. My father’s secretaries received calls every 20 minutes or so with unknown people stating, “give the get”. It greatly disrupted my father’s medical staff, and they are ready, willing and able to testify in this matter.

160. My father was extremely upset and perturbed by the set of circumstances he was facing that day and with the future threats of protests outside his office.

161. My dad advised me that if I did not give the GET that night he would have no choice but to permanently throw me out of his home because of Laurie Beda’s threat to bring the mob rioters to his home and medical office because he was an “enabler” and supporting get abuse(as will be seen later on in this complaint the mob was going to come to our homes regardless of if I was present).

162. My father was facing extreme pressure from the threat of the mob, which is exactly what the Syrian Jewish Community Divorce mob attempts to do by attacking not only the husband but the entire family of the man they deem is a Get refuser.

163. My relationship with my father deteriorated overnight because of the credible threats of Laurie Beda.

164. My father and I did not want any Hirsch properties to be egged and trashed like the mob did the previous nights to Dibo Hafif's home.

165. The cops explicitly stated they would allow the mob to egg our home and the only thing I could do to protect my father's properties, one of which is my permanent residence, was to give the GET as the Defendants demanded.

166. Upon information and belief, Laurie Beda, then advised people to leave bad reviews on my father's name on google review. Four separate reviews were made March 11, 2021, by people with names not listed in my father's patient list database all stating lies and leaving terrible reviews for my dad, which he advised me that attorneys advised him it will cost him thousands of dollars to remove the posts(he also told me he is not even sure that it's possible to remove the posts).

167. By hurting my father's business, Laurie Beda made me suffer since my father is the one who gives me a place to live and loans me money for basic living expenses when my income does not cover my expenses.

168. On March 10, 2021, a woman can be seen on video surveillance on my father's property located at 1861 East 22nd Brooklyn, NY 11229, dropping off papers which stated "Free Elizabeth. Give her a GET". This woman then came into the backyard of our property and

dropped off leaflets. I presume Laurie Beda sent this woman to our home. It is possible that the woman was one of her daughters, but the video is not clear enough to confirm that.

169. During the summer of 2018, Laurie Beda engaged in a malicious campaign of besmirching my name throughout the Syrian Jewish Community, which Elizabeth Kairey, Laurie Beda, and Norma Tawil, are all members of. Moreover, Leon Beda, the husband of Laurie Beda, personally advised me back in 2018 that his wife pressured him to donate money to the legal expenses of Elizabeth Kairey. He told me that he obliged to his wife's request but advised her he would not be continuing to fund her litigation. He told me he gave around \$1000 and told his wife he would not be giving any more money as he felt that it was equivalent to throwing money in the garbage.

II. DEFENDANT NORMA TAWIL

170. Norma Tawil goes by Norma. Tawil on her Instagram account. Norma is the daughter of Laurie Beda.

171. Norma Tawil has a picture of her and her husband, attorney Ralph Tawil, and one child(presumably their child), as her icon photo on her Instagram page.

172. On or about, March 11, 2021, Norma Tawil commented on one of Manopla's live videos, "Elliot I feel bad for you that you sit home all day doing nothing except troll Abe's page. Get a life. Fake attorney. I bet you failed the bar exam more than once." Her message received likes by several people, meaning it was viewed and approved of by others.

173. On or about March 11, 2021, a comment was posted under the name Norma Tawil on the webpage campaign chesedfund mentioned prior that stated, "free Elizabeth so that she can get her life back."

174. Norma Tawil also attended the March 11, 2021, protest at Corporal Wiltshire Park that was organized against me and she also attended a “Get” party by Elizabeth Kairey’s home.

175. Norma Tawil stood amongst her mother, Laurie Beda, while her mother issued explicit threats of bringing a mob to my home to terrorize me and my family.

III. DEFENDANTS HESHY TISCHLER AND AMBER ADLER

176. Amber Adler and Heshy Tischler are two separate individuals who were running for New York City Council 48th District during the week of March 7, 2021-March 12, 2021. Both potential councils lost the election by a wide margin.

177. Amber Adler and Heshy Tischler both utilized their social media platform including but not limited to Instagram, which they have thousands of followers, to engage in a serious harassment, defamation, and intimidation campaign of Jewish orthodox men, me included, who have not granted their respective wives a GET.

178. Amber Adler and Heshy Tischler both engaged, incited, and participated in illegal riots/protests in Brooklyn, New York the week of March 8, 2021. Both Amber Adler and Heshy Tischler advocated lawless behavior.

179. On March 10, 2021, Heshy Tischler and Amber Adler both were present, participated and incited an illegal riotous protest of a man named Dibo Hafif.

180. Said protest took place at 2136 East 5th street Brooklyn, NY 11223. I have video evidence of both of these Defendants at the riot.

181. On one of the live videos of Manopla, a guest appeared and was present at the Dibo riot and advised Manopla that there were approximately 1000 people at the riot and that

people were throwing eggs at Dibo's house. This same guest told Manopla that there was only one police car at the riot and that "we can do whatever we want." This same guest told Manopla that he believed if this continued(the rioting) they would get a Get from Dibo very quickly.

182. The mob blocked the public street, threw eggs at Dibo's home, screamed, and honked car horns from approximately 830pm to 2am that night, terrorizing him and his 3 minor children.

183. The mob also tampered with the air conditioning units on Dibo's property.

184. Only one police car is seen in the numerous videos of the Dibo riots and no attempt by the NYPD was made to disperse said riot. One police officer appeared on the Manopla live and appeared completely clueless as to what was happening. It was obvious that only one cop was sent to control a riot of 1000 people and it was completely impossible for him to do so.

185. At several points during the rally, Heshy Tischler and Amber Adler both incited more hatred towards Dibo Hafif by acting as leaders of the riot and speaking on loudspeakers to the protestors. Chants were being screamed "Heshy, Heshy, Heshy". Once Heshy was seen at the riots more and more people showed up. Important to note is that Mr. Tischler has a criminal history and is convicted felon, which includes a violation of inciting a riot.⁷

186. Heshy Tischler specifically stated that he would state Dibo's name on his show every single day until he gave a Get in an effort to publicly humiliate him. He said he would do this to every man who doesn't give his wife a GET and use his radio platform to do so.

⁷ <https://nypost.com/2021/05/08/nyc-firebrand-heshy-tischler-pleads-guilty-to-inciting-mob-to-attack-reporter/>

187. Amber Adler held up a large sign at said protest which read “No GET-No Peace” thereby advocating unruly, violent, and lawless behavior. Amber also made numerous public statements, which she posted on her own Instagram accounts accusing men like me of committing abusive behavior and accusing me of committing “coercive control.”

188. Heshy and Amber used this massive riot which gained tremendous social media attention as an opportunity to promote themselves for their respective campaigns running for New York City Council and Amber actually used her appearances there to gain fame and she was featured in the Vogue Magazine article I mentioned at the beginning of this complaint.

189. The following day, March 11, 2021, both Amber Adler and Heshy Tischler attended and co-led an illegal protest at the corner of Ocean Ave and Kings Highway in Brooklyn, New York that was specifically organized in order to cause so much intense and severe emotional distress on me that I would have no choice but to give in to the extortionary threats and give my wife a GET “willingly”. I say willingly because during the process of a Get a husband is required to say, “I am not being forced to give this get and I am giving it on my own free will.” But just like United States Criminal Law, Jewish Law voids a Get given under duress even if the husband states “I am giving the get willingly.”

190. Said protest was mainly promoted by Adina Miles, but several other highly popular Instagram accounts posted a flyer urging people to attend this protest. Said flyer was posted in the previous paragraphs of this complaint.

191. A picture of my wife, Elizabeth Kairey, with our daughter(whose face was blotted out) was put on the flyer for this protest and specifically stated “free Elizabeth”, which proves

that the organizers of the protest were working in concert with the Edmond J. Safra Synagogue who created said slogan.

192. The express purpose of the protest was for the purposes of extorting a Get from me.

193. Several Instagram posts specifically stated that the purpose of the protest was to humiliate me publicly and bring my divorce matter to the public eye so that I would be pressured into giving my wife a Jewish divorce. Indeed, I received hundreds of texts and phone calls about this protest and all my friends, and my family were worried for my safety and well-being.

194. Amber Adler and Heshy Tischler both gave speeches at this protest to the unruly crowd of illegal protesters.

195. At the time of the protest, according to NYC 311 website, all protests with over certain number of individuals, which this protest certainly was over the limit, must have a legal permit. A permit must be applied for at least 2 weeks prior to the protest. Moreover, if a loudspeaker will be used, a special sound permit must be applied for as well.

196. Said protest was only organized a couple days prior to the March 11, 2021, protest. Accordingly, it is technically impossible that the protest was legally permitted yet the NYPD did not disperse the protest and Heshy and Amber, by definition, participated in an illegal protest directed at me.

197. Only one police car was present for said protest which, according to videos had circa 60-80 people present.

198. Amber Adler and Heshy Tischler both held up a giant sign which stated, “No GET, No Peace.” Accordingly, Amber Adler and Heshy Tischler were advocating for unruly and unpeaceful behavior towards me and my family members. Additionally, Heshy posted a video of himself at the protest, smiling in a picture with Betti and Alex Missry, my wife’s first cousin, see below picture:



Video



heshy_tischler • Following



2,493 views

heshy_tischler Thank you Heshy Tischler for your

199. The previous night at the Dibo riot, it was explicitly stated by the mob leaders on loudspeaker that the following day a “rally” was taking place at King Highway and Ocean Ave. And it was requested from the crowd that they attend the “rally” at Kings Highway.

200. Accordingly, I have irrefutable evidence proving that the mob leaders of the Dibo riot were working in concert with the organizers of the protests and riots directed at me.

201. Additionally, at the March 11, 2021, protest, the mob members stated they were heading to my home and father’s office the following day if I did not give the GET that night.

202. At the Kings Highway protest, Heshy Tischler stated publicly in a video that he posted to his Instagram account the following statement: “ we are at a demonstration. This guy Elliot Hirsch did not give a GET. And we are here demonstrating, and we are going to get that *GET*.” Then Heshy said “So I just spoke to this guy Jeffrey Stern, a federal Judge, that is guaranteeing Dr. Hirsch, actually Mr. Hirsch will give the *GET*. They are asking us not to come over there to Dr. Hirsch’s office, I know you want to go over there.”

203. I received all of these threats that day when the protest was occurring.

204. On March 12, 2021, Heshy Tischler posted a picture of himself at the protest with a caption stating, “Elizabeth Kairey Hirsch got her get.”

205. Amber Adler also made a public speech at the protest, which she posted on her Instagram account as well, advising the crowd that she will help these women who have no *GET*’s, obviously including my wife, who the protest was organized for. She accused me of committing abuse to my wife and of “coercive control.” See here photo:



206. Amber Adler then stated to the crowd that she is trying to get a bill passed in the New York State Legislature that would make not giving a GET a felony in New York.

207. Both Amber Adler and Heshy Tischler were aware that by coming to my protest and speaking about me and my personal divorce matter to their thousands of followers that it would cause me much public humiliation, cause me severe emotional distress and intense harassment.

208. Heshy verified on a public video that is available on YouTube that he relied upon the organizers of the campaign and did not look into the facts of the case before publicly humiliating me. Heshy admitted to engaging in a public humiliation campaign against me.

209. Heshy then offered me employment opportunity working for him after realizing that I am a nice guy and was publicly humiliated without good cause.

210. Heshy offered me said employment opportunity publicly as well.

211. However, after Heshy made said video, he sent me private messages that he received from various members of the Syrian Community cursing him out with vile language and they threatened him with taking away donations they were giving him for his campaign simply because he was now friends with me and offering me employment opportunities.

212. Heshy now has not made good on his promise to hire me because he will be publicly thrashed by this powerful Syrian Jewish community, which is one of the most affluent communities in the world. Heshy, by associating himself with me, was subjected to serious harassment with threats of losing donations.

213. This is but one example of the permanent damage I have suffered because of the all the Defendants in this case. And the job Heshy offered me was going to pay me over \$100,000. But now that opportunity is lost because of the permanent reputation damage I have because these Defendants caused thousands of people to label me an “abuser.”

IV. DEFENDANT ADINA MILES

214. Adina Miles is a woman who has an Instagram account called “flatbushgirl.”

215. On or about March 10, 2021, Adina Miles’ Instagram account had roughly 55,700 followers. She is an extremely popular self-proclaimed Orthodox Female Feminist and is certainly considered a public figure.⁸

216. On or about March 9, 2021, Adina Miles posted on her Instagram account a picture of my wife with the caption “free Elizabeth”. On said flyer was a call to all of Adina Miles’ followers requesting their attendance at an impromptu protest starting at Corporal Wiltshire Park located in Brooklyn, New York at 10am on March 11, 2021. Said flyer was posted in prior portions of this complaint.

217. Adina Miles, who has a highly popular Instagram account, helped organize an illegal protest to commence at said park with the intention to come down the block to my father’s medical practice, as evidenced with the words “starting” located on the flyer.

218. According to Miles, the express purpose of the protest was to publicly humiliate me and pressure me and my family until I gave my wife a GET and “set her free.”

⁸ https://en.wikipedia.org/wiki/Adina_Sash

219. On March 11, 2021, Adina Miles was one of the people leading the protest at Corporal Wiltshire Park.

220. According to the 311 websites of NYC, protests need valid permits and if using loudspeakers, sound permits are additionally required. Adina Miles is seen in videos using a loudspeaker at said protest in addition to Amber Adler as well who used a loud speakerphone.

221. At said protest, Ms. Miles, specifically stated that if I do not give my wife the GET that day she would come back the following day to continue protesting. She further confirmed this by a post on her Instagram account the same day.

222. Miles was part of a group of women that specifically stated they would bring the protestors to my father's medical office and then our homes.

223. On or about March 11, 2021, Adina Miles posted on her Instagram account videos of the protest, and she acknowledged all of the above-mentioned threats that were made to me.

224. I received all of these videos and posts via electronic means while in the State of New Jersey.

225. The next day, March 12, 2021, Adina Miles, posted a flyer which stated, "Elizabeth is free". She captioned the flyer with a warning on her Instagram account advising all "get refusers" that you will be next. It is obvious that she was referring to me as the first GET refuser she went after.

226. She then stated, "we will publicly humiliate me, we will have you fired from your job, we will find ways to have you arrested" and "we will not rest until every prisoner is set free" as shown in the below photo:

Elizabeth is Free

one down,
hundreds to go.

@flatbushgirl



Liked by **juniors_jewels** and **3,586 others**

flatbushgirl Social media works.

Activism works.

Pressure works.

⚠️ Attention Get Refusers ⚠️

YOU'RE NEXT.

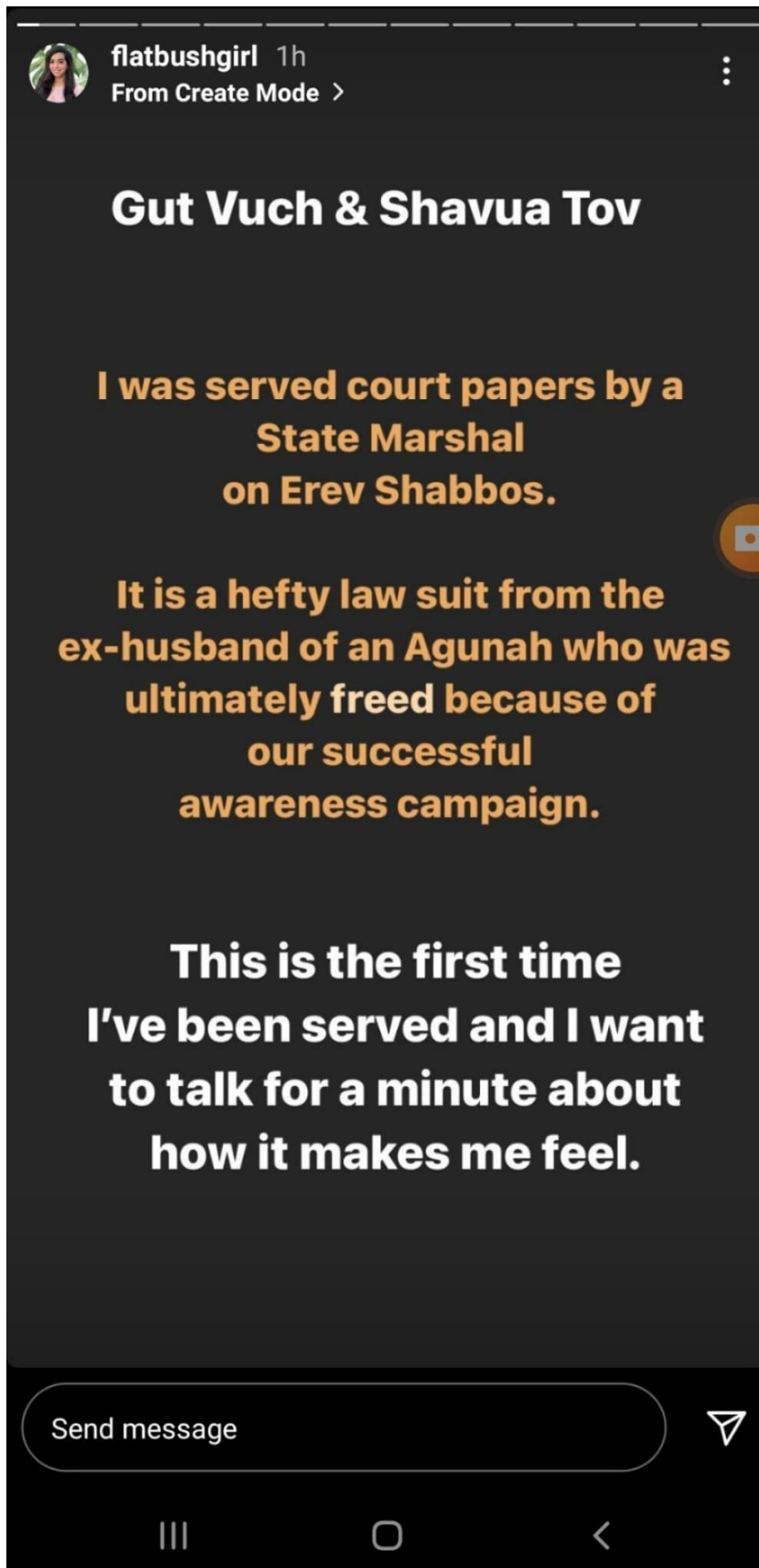
We will have you fired from your job.

We will publicly humiliate you.

We will find ways to have you arrested.

And we will not rest until every prisoner is set FREE.

227. On or about August 15, 2021, after the U.S Marshalls served Adina Miles with the previous complaint filed in this Court, Ms. Miles took to her Instagram account to double down on her harassment and defamation of me and thereby show her contempt for this lawsuit by publicly advising her 50,000 followers that she was served with a lawsuit “from the ex-husband of an Agunah who was ultimately freed because of our awareness campaign” as seen here :



228. She also advised her followers that the lawsuit is public knowledge and thereafter I received numerous text messages from people asking me if I was the one to sue Adina Miles being that Adina Miles publicly advertised my divorce controversy. I can provide these messages to the Court at trial.

229. Additionally, Adina Miles used her harassment campaign against me to gain fame and enrich herself and this culminated in her being photographed and interviewed by The Vogue magazine company.

230. Vogue is quoted as stating “[d]uring the rally, Miles-Sash and a group of women were approached by a prominent local rabbi who offered to broker the get. “And we were like, ‘We’re not backing down,’” says Miles-Sash. She filmed the interaction and later put it on social media. “We had 40,000 views,” says Miles-Sash. That night at 8 p.m., the woman received her get.”⁹ Additionally, a woman named Avital Goldschmidt wrote an article on March 31, 2021¹⁰ and stated “Social media works. Activism works. Pressure works,” Orthodox feminist activist Adina Miles-Sash posted earlier this month on Instagram when one agunah finally received her divorce, which many credited to social media pressure. Speaking to gett refusers, Miles-Sash wrote: “We will have you fired from your job. We will publicly humiliate you. We will find ways to have you arrested. And we will not rest until every prisoner is set free.” And this portion of the article is referring to this particular case; namely me Elliot M. Hirsch who gave my wife Kairey a Get, who this article named my wife an “agunah”. And all those in the Orthodox Jewish Community are aware that even though my name is not mentioned in this portion of the article,

⁹ <https://www.vogue.com/article/agunah-get-refusal-social-media-campaign-orthodox-women>

¹⁰ <https://religionandpolitics.org/2021/03/30/is-social-media-fueling-a-womens-rights-revolution-in-the-orthodox-jewish-community/>

that I am the subject of its content being that Adina Miles posted my wife's flyer on her account and celebrated Elizabeth receiving a Get.

V. DEFENDANT YESHIVA OF FLATBUSH JOEL BRAVERMAN HIGH SCHOOL

231. On March 11, 2021, at 11am, Yeshiva of Flatbush High School, which is located in Brooklyn, NY, sent about 10 or so of their female students to attend the illegal protest at Kings Highway and Ocean ave as can be seen in this photo where the girls and their supervisor stand together holding a sign stating, "let her go", accusing me of the crime of either false imprisonment and/or kidnapping :

Bklyner.



In the meantime, the agunot protests will likely continue, and many hope they will spur more lasting change.



Students from the Yeshivah of Flatbush High School at a recent protest. (Image: Adina Miles-Sash/[FlatbushGirl](#))

232. According to a Manopla live, Yeshiva of Flatbush gave the girls who came to the protest “chesed hours.”

232. Yeshiva of Flatbush requires its students to participate in 50 hours of community service per year in order to move on to the next grade. I know this information because I am a former student of the Yeshiva of Flatbush High School.

233. The term chesed hours refers to the community service the Yeshiva requires its students to participate in.

234. It is obvious that these Defendants or my wife and her family contacted the Yeshiva of Flatbush to send students to harass and publicly humiliate me and join the mob, which threatened to come to my private residences.

235. Yeshiva of Flatbush is one of the premier Jewish Orthodox educational institutions.

236. By endorsing the harassment against me, the Yeshiva of Flatbush gave the impression to the public that this cause was righteous and praiseworthy.

237. The Yeshiva of Flatbush sent its students on a school day with the express purpose of publicly humiliating me and harassing me to give my wife a GET. I cannot recall any time an educational institution in this country sending its students on a school day to attend a private protest organized for the express purpose of causing a private individual such severe and extreme emotional distress. If there were a category above intentional infliction of emotional distress this school’s action would qualify as such.

238. I believe this Defendant is the most respected and high powerful entity/individual listed in this complaint and its participation truly destroyed my good will and reputation in the community for years to come if not permanently.

239. Yeshiva of Flatbush is a school that I attended from 5th grade through 12th grade.

240. This Yeshiva is well aware of my ADHD condition as I was routinely seen by the school therapists in addition to receiving extra time on my examinations.

241. This Yeshiva displayed incomprehensible behavior by intentionally sending its students, on a school day, to a protest, which was not legally organized, for the express purpose of harassing, threatening and extorting me into giving my wife a GET.

VI. DEFENDANT ELISHEVA YARIMI

242. Elisheva Yarimi is a woman who has around 11,000 Instagram followers, an objectively large amount of followers, and her Instagram name is called iitsanellie.

243. Any person or entity with over 10,000 followers is considered a quasi-public figure. Only celebrities like Kim Kardashian or Tom Brady have 1 million plus followers.

244. Elisheva was one of the leaders of the mob at Dibo Hafif's riots and I can present videos to this Court showing her doing so.

245. Elisheva posted on her Instagram account that Dibo was put in jail. A fact which is verified by a video and numerous news site which shows Dibo being arrested by the NYPD.

246. According to news media sites, a member of the Syrian community convinced Dibo's current wife to have Dibo arrested.

247. On March 9 and March 10, 2021, at 2136 East 5th street, Brooklyn, NY 11223, there were illegal riots outside of Dibo Hafif's home, for the express purpose of intimidating and harassing him into giving his wife a Get and it certainly worked.

248. The protests were led by Heshy Tischler, Amber Adler and Elisheva Yarimi.

249. On March 10, 2021, in front of Dibo's house, Elisheva Yarimi publicly advised the mob to attend the Kings Highway and Ocean Ave rally(for Elizabeth Kairey) the next day at 10am, thereby cementing herself in this Get conspiracy.

250. Additionally, while leading the crowd of thousand-plus rioters, Elisheva Yarimi, using a loudspeaker she was holding stated the following : “ No get, No peace”, “ no justice, no peace, when do we want it, now” , “we will be here every single night harassing your life.”

251. It is abundantly clear that the leaders of the GET riots knowingly engaged in harassing behavior with the intent to cause such severe and intense emotional distress that Dibo and myself would have no choice but to give our respective wives a Get.

252. The next day, March 11, 2021, Elisheva posted a flyer on her Instagram account advising her followers the following:



iitsanellie 10m
From Create Mode



UPDATE:
JEFF HAFIF HAS BEEN ARRESTED.

THE RALLY FOR EVET WILL NOT BE HAPPENING TONIGHT
AS THE ABUSIVE JEFF DIBBO HAFIF IS NOW IN JAIL
THANK GOD.

HOWEVER, LISTEN UP.
WE ARE NOW TAKING OUR FOCUS TO ELIZABETH KAIREY.
HER HUSBAND ELLIOT HIRSCH HAS REFUSED ELIZABETH A
GET FOR OVER 4 YEARS.

JOIN ME IN USING OUR VOICES TONIGHT TO GET ELLIOT
HIRSCH TO GIVE ELIZABETH A GET.
HELP US HELP ELIZABETH AND HER DAUGHTER MOVE ON.

ADDRESS AND LOCATION WILL BE POSTED SOON.

STAY TUNED.

TURN NOTIFICATIONS ON.

253. As can be seen in the above post, Elisheva advised her followers that I was the new subject of the nightly illegal Brooklyn riots, where eggs were thrown, property was destroyed, and 1000 people rioted from approximately 8pm to 2am.

254. Although Yarimi stated in her public flyer to use “voices”, the mob, in fact, dumped dog feces, threw eggs, broke air conditioning units, damaged vehicles, honked horns and blocked the entire street at the home of Dibo Hafif from 8pm to 2am on consecutive nights March 9, 2021, and March 10, 2021.

255. If I did not give a Get to my wife on March 11, 2021, it is absolutely certain that the mob would have surrounded both my home in Oakhurst, NJ and Brooklyn, NY that same evening and completely destroyed my property as they did to Dibo the previous nights.

VII. DEFENDANT NOURITE MAIMON

256. On March 11, 2021, Ms. Nourite Maimon stood beside Laurie Beda protesting me at Kings Highway and Ocean Ave and thereby supported the violence and intimidation threats directed at me for the purpose of extortion.

257. On March 11, 2021, at about 3pm, after Ms. Nourite Maimon attended the protest, she appeared as a guest on a Manopla live video titled “hirsch update”, which was viewed by over 5000 people.

258. During this live, Ms. Maimon stated “looks like Elliot Hirsch is playing around ,which is nothing new, and the minute we hear that this GET is not going through, really, everybody in this community that has a pulse has to be there(the planned illegal mob riot for 9pm, March 11, 2021, at 1861 East 22nd street, Brooklyn, NY 11229- my parents Brooklyn home) to support Elizabeth. The march this morning I was there, to tell you the truth the show

was a little disappointing. And when Rabbi Ozeri said he would be there the next morning, I felt that would really make a statement. I don't have much to say except that every person in this community needs to be there and I know its Friday morning and its shabbat. This is a human rights issue. And its everybody."

259. She then stated, "don't let the pressure down." And she said that "Rabbi Ozeri said that the only reason this family is at the table as we speak is because all of us are putting on the pressure."

260. She then stated, "wrong is wrong. I do not stand by people who do wrong to other people."

261. She then stated, "our rabbis cannot do this alone, We, as a people, have to come together and we are an army and Elizabeth needs her army."

262. Ms. Maimon then stated, "but guess what. Elliot Hirsch keeps referring to himself as a lawyer, lawyer, lawyer. He is no lawyer. And we have a real lawyer on our hands who is ready to go to battle for us, Moshe Maimon."

263. Moshe Maimon is a partner at a prestigious law firm called Levi Konigsberg LLP.¹¹ And according to his wife, Nourite, he was ready to "battle" for them should the need arise. Based upon the context of Ms. Maimon's statement I believe it's reasonable to assume that she was stating her husband would litigate for her and all those who would need assistance should the need arise. Apparently, Ms. Maimon subscribed to the same sentiment stated by

¹¹ <https://www.levylaw.com/lawyer/moshe-maimon/>

Manopla on one of his lives where he explicitly stated he was worried about potential lawsuits being filed against all the parties involved.

VIII. DEFENDANT EVE SCABA

264. On March 11, 2021, at about 3pm, Ms. Eve Scaba appeared as a guest on a live commenced by Manopla titled “hirsch update”, the same video that Nourite Maimon appeared on.

265. On said live, Ms. Eva Scaba stated that she attended the protest at Kings Highway and Ocean Avenue.

266. On said live, Ms. Scaba stated my name “hirsch”. And said it’s not fair what is happening to Elizabeth.

267. Manopla then stated on this live to Eva Scaba , “but you know again it’s their life(referring to Elizabeth and me), you know what I mean. You know there is so much you can infringe on other people’s lives; you know what I mean.”

268. After Manopla stated this to Eva Scaba, Ms. Scaba then stated “ honestly, I think everyone should go tonight. And that is what we said we are going to do. 9 or 10pm at night. If nothing happens by then. We need to go again. To which, Manopla said, “where, the parent’s house?”, which Eva responded “of course”. Manopla then said, “but what if he is not at the parent’s house”. And then Eva stated, “who cares”, “it is the same thing with Dibo. Everyone went to the house, and he was not there.” Accordingly, whether or not I was home, these people were going to come to my Jersey and Brooklyn homes.

269. During this conversation, there were many people commenting on the live video attacking Manopla for “defending me.”(this same thing happened to Heshy Tischler once he made a public apology to me and offered me a job)

270. Manopla was reading the comments and stated to the followers, “ Guys. These commenters. I am not defending him. I am not defending him.” This shows that even Manopla was getting overwhelmed and anxious just from seeing the comments attacking him for defending me.

271. On the live video between Saul Harari and Manopla mentioned in the introduction of this complaint, Saul told Manopla “ remember when the mob turned on you for defending hirsch”, which further evidences the plethora amount of people that were exposed to these live Instagram videos and the constant harassment of threats to anyone who will express any sort of positive feelings regarding me.

IX. DEFENDANT LAUREN DAGMY

272. On or about March 10, 2021, Ms. Lauren Dagmy posted a photo of me with several captions that read: “Get refuser alert, Elliot Hirsch, Justice for Elizabeth.” And at the top of the photo read “abuser.”

273. Ms. Dagmy, who has an Instagram account named Len_dagmy, posted said photo on her Instagram story for all of her 703 followers to see. And she urged the followers to share the message, which included the directive to completely ostracize me from the community including but not limited to not “servicing me in any way.”

274. Said post was shared by thousands of people but I only can prove that this lady posted said flyer about me to her followers seen here:



X. DEFENDANT SARAH MIZRACHI

275. During the week of March 8-March 11, 2021, Sarah Mizrachi posted on her WhatsApp Status a picture of me and my parents publicizing the fact that I was “withholding a get” as seen here:





276. On or about March 8- March 11, 2021, Sarah Mizrachi, who is the owner of the account called gourmet_handmade, posted a comment on Eva Shammah's public post stating my name as the man who was the subject of the chesed fund campaign, since she posted several comments on Instagram expressing her confusion as to why the Community News did not explicitly mention my name in their Instagram Post.

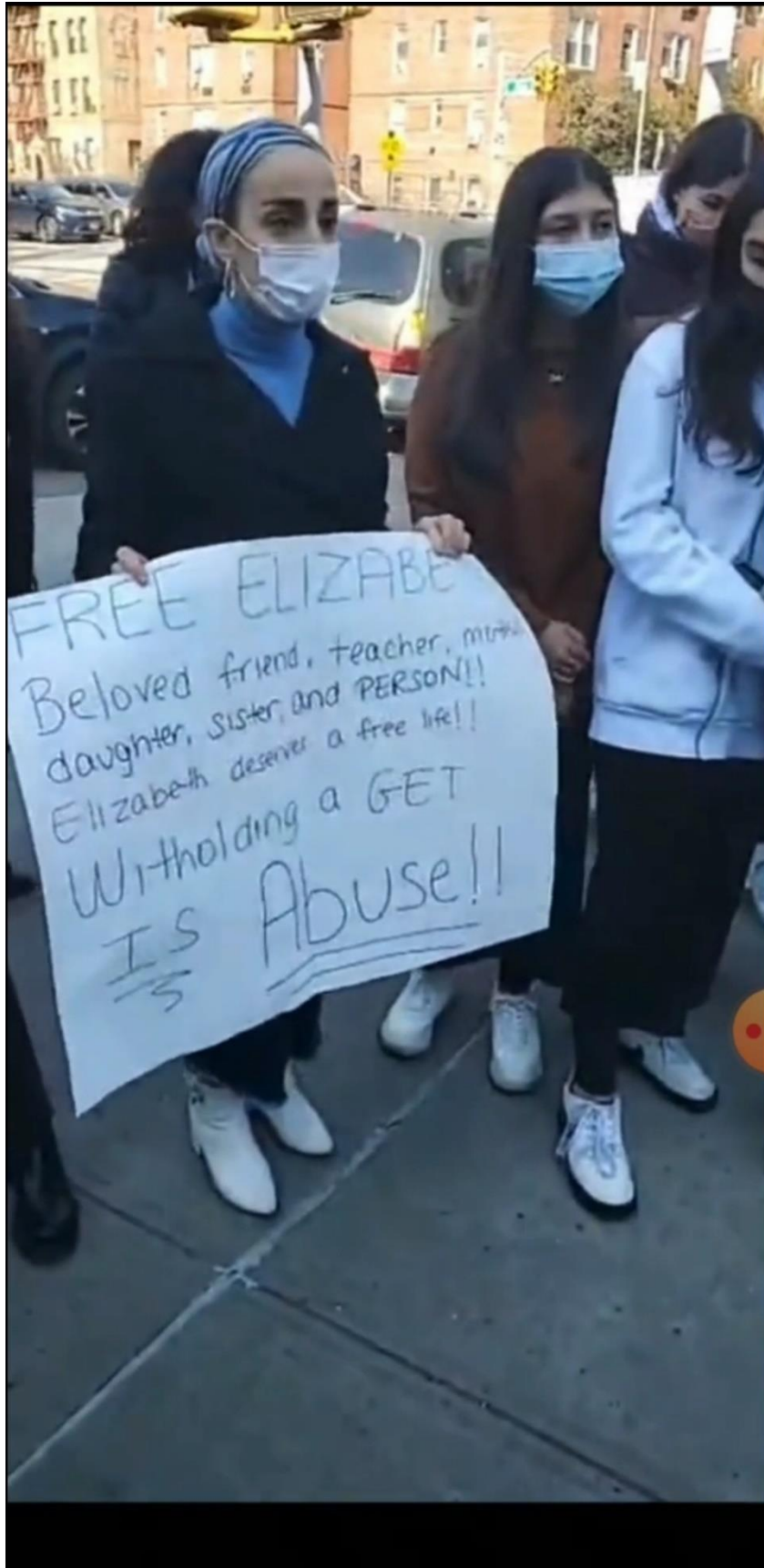
277. Many of these Defendants incorrectly thought that by not explicitly stating my name in their posts, that they thereby were avoiding a potential defamation lawsuit. However, it is obvious they did not consult an attorney prior to doing so as all that is required for defamation is that people know who is the subject that is being defamed and spoken about.

278. Sarah made several comments on Instagram labeling me as the "get refuser" under the posts that defamed and threatened me, unwittingly cementing her liability for defamation and co-conspirator.

XI. DEFENDANT YAFAH SUTTON

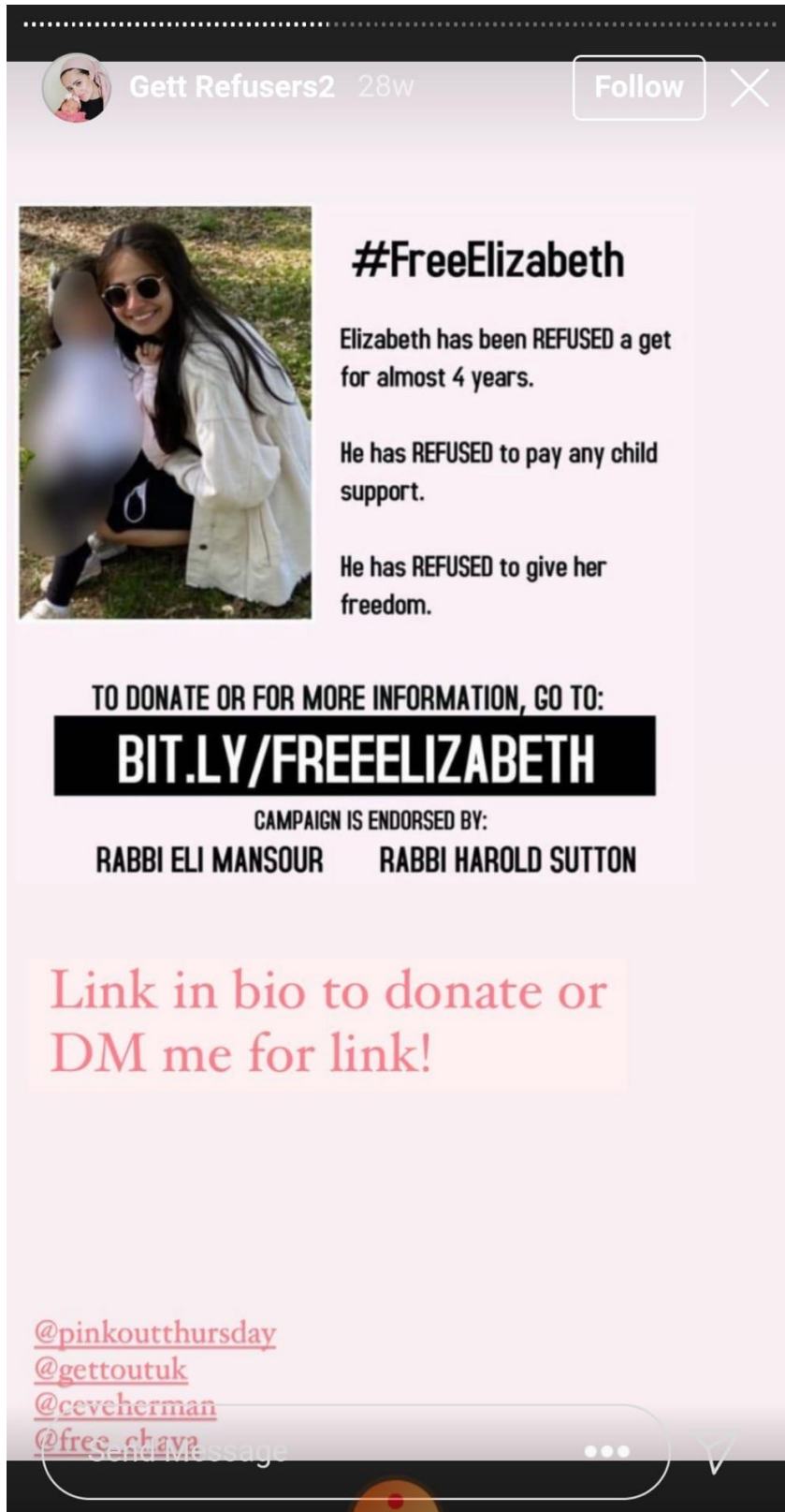
279. On March 11, 2021, Yafah Sutton attended the illegal protest at Kings Highway and Ocean Ave.

280. Yafah was photographed holding up a sign in a public forum which accused me of abuse as seen here:



XII. DEFENDANT ISABELLA KHAIMOV

281. On or about March 9, 2021, and March 10, 2021, and March 11, 2021, this Defendant, who has an Instagram account named “schugspiceandeverythingrice”, in which she has around 2500 followers, posted a flyer that she personally created advocating for the donation to the “free Elizabeth chesed fund campaign” as seen here :



282. As can be seen in the post, this defendant falsely claimed that I am guilty of not paying child support and by placing the picture of my wife and the hashtag of free Elizabeth she thereby expressly associated herself with every other Defendant here.

283. This Defendant also posted a video on her account stating that because Rabbi Eli Mansour put his name on the campaign that she felt it was automatically worthy of donations and support since this Rabbi is extremely famous and reputable.

XIII. DEFENDANT EDMOND J. SAFRA SYNAGOGUE INC OF BROOKLYN NY

284. The Edmond J. Safra Synagogue is located in Brooklyn, NY and Elizabeth Kairey and her family are all members of said synagogue.

285. On March 8, 2021, The Edmond J. Safra Synagogue created a “charity” campaign with the title “Free Elizabeth” under the link <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

286. On the webpage was a picture of my wife, Elizabeth Kairey holding our daughter.


287. The picture had blotted out the face of my daughter, but the exact same picture was used by Elizabeth Kairey on her private Instagram account which she goes by as ElizabethKairey.

288. On Elizabeth Kairey’s Instagram, the picture was not blotted out and my daughter’s face is able to be seen. Accordingly, the picture on the webpage is certainly my wife and child.

289. The exact description used on the webpage started off with “THIS CAMPAIGN IS ENDORSED BY RABBI ELI MANSOUR. Jacob S. Kassin Hessed Fund, All donations are

tax deductible, HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back! Donate, She has accumulated lawyer's fees surrounding the case and has a 4-year-old child to support on her own. He has REFUSED to pay any child support and has REFUSED to give her freedom, despite the direction of the Beit Din. She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child. She works as a teacher in a community school. Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees. This man is waging a relentless legal campaign against Elizabeth and her family including appeals of every decision of the civil court. He has been instructed by the Beit Din to give a get and on numerous accounts refused. REFUSING A GET IS ABUSE AND IT NEEDS TO STOP! We need to help her stay strong and help alleviate this financial burden! Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava). #FREEELIZABETH

←



⋮

3/8/2021

Free Elizabeth! | The Chesed Fund

LATEST CAMPAIGNS FOR ORGANIZATIONS SUPPORT

TheChesedFund

1

Free Elizabeth!




<https://thechesedfund.com/jacobskassinchesedfund/freetelizabeth>

1/4

3/8/2021

Free Elizabeth! | The Chesed Fund



\$55,212.94

donated by 453 people

Goal: \$100,000

Donate

Share Campaign

THIS CAMPAIGN IS ENDORSED BY RABBI ELI MANSOUR.

Jacob S. Kassin Hessed Fund

All donations are tax deductible

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

<https://thechesedfund.com/jacobskassinchesedfund/freetelizabeth>

2/4

3/8/2021

Free Elizabeth! | The Chesed Fund

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

He has REFUSED to pay any child support and has REFUSED to give her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.



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290. The way the webpage functions is that when a person donates money they can share their name or go anonymously.

291. As described in the prior portions of this complaint, this webpage creator, was in full control of the comments section on the Chesed Fund and is unequivocally and absolutely responsible for all threats of violence and intimidation that were made towards me.

292. I will now quote some of the comments that were posted on this webpage:

A. Lets break his legs that bastard.(this comment is still up currently see Exhibit C attached hereto)

B. Elliot you are evil. Elizabeth as you can see everybody loves you. Stay strong.

C. boycott Dr. Jonathan Hirsch.

D. Let's make a physical gathering and make him give that GET now. No one is free of his evil deeds. That day will come. Give that get today!

E. wow, let's do that, good idea, he'll regret every day he held her back, Where do we go? He'll get scared and give it(the GET) immediately."

C/O JACOB S. KASSIN HESSED FUND
1801 Ocean Parkway
Brooklyn, NY

Tax ID: 205569592

Contact Organizer

communityagunahfund@gmail.com

Recent Donations



effective amount

4 minutes ago

Anonymous Donor

\$10

7 minutes ago

Anonymous Donor

\$10

10 minutes ago

*Let's make a physical gathering and make him give that
now. No one is free of his evil deeds The Day will
come- give that get today!*

Anonymous Donor

\$10

18 minutes ago

Anonymous Donor

\$10

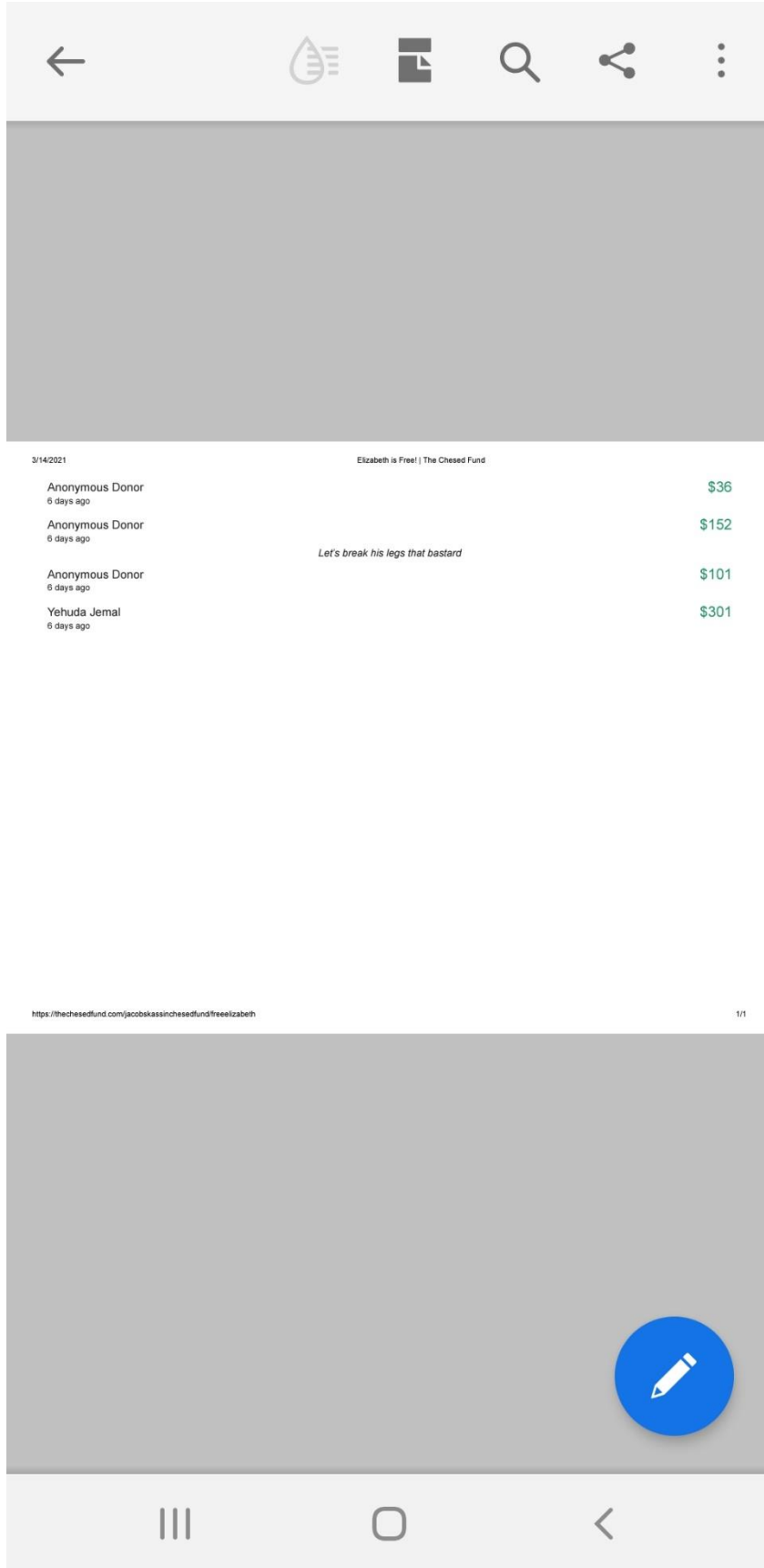
19 minutes ago

Anonymous Donor

25 minutes ago



Donate



293. This webpage published these threats on a facility of interstate commerce for the express purpose of attempting to extort a Get from me. The webpage had a feature that allowed viewers to simply push a button to share the link and encouraged the viewers to share the link and spread its content.







294. This webpage is directly responsible for inciting thousands of people to send me harassing and threatening messages to my personal cell phone harassing me to give my wife a Get.


295. This webpage was authored by Elizabeth Kairey, with her approval and the approval and direct involvement of the head Rabbi of said synagogue, Rabbi Eli Mansour.

296. The creation of this webpage is the direct reason why I was subjected to consecutive protests and threats of nightly riot violence. Every single Defendant in this case is a co-conspirator with Edmond J. Safra Synagogue by their explicit mention of the #freeelizabeth chesed fund campaign and asking people to join and help the mission.

297. Once I gave Elizabeth the GET on March 11, 2021, at approximately 8:15pm, the webpage changed its content to read: "Title- Elizabeth is Free. THANK YOU EVERYBODY FOR YOUR AMAZING SUPPORT! We've raised a significant amount of money for Elizabeth, and she is officially free!! Baruch Hashem! THIS CAMPAIGN IS ENDORSED BY: RABBI ELI MANSOUR- Head Rabbi of Edmond J. Safra Synagogue in Brooklyn, NY RABBI HAROLD SUTTON- Rosh HaYeshivah of the Sephardic Rabbinical College, Magen David Yeshivah and Yeshivat Moreshet Yerushalayim, in Israel. RABBI TIDHAR COHEN- Beit Horaah 'Emet Vasedek', Brooklyn, NY RABBI MAX SUTTON Rosh Beit Din Aram Soba Jerusalem, Israel All donations are tax deductible. *PLEASE DO NOT POST ANY NEGATIVE

COMMENTS* HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back! She has accumulated lawyer's fees surrounding the case and has a 4-year-old child to support on her own. She has been refused child support and her freedom, despite the direction of the Beit Din. She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child. She works as a teacher in a community school. Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees. REFUSING A GET IS ABUSE AND IT NEEDS TO STOP! We need to help her stay strong and help alleviate this financial burden! Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava). #FREEELIZABETH Created By The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund 1801 Ocean Parkway Brooklyn, NY.



\$128,353.29
donated by 1066 people

Goal: \$150,000

Donate

Share Campaign

THANK YOU EVERYBODY FOR YOUR AMAZING SUPPORT!

We've raised a significant amount of money for Elizabeth and she is officially free!! Baruch Hashem!

THIS CAMPAIGN IS ENDORSED BY:

RABBI ELI MANSOUR- Head Rabbi of Edmond J. Safra Synagogue in Brooklyn, NY

RABBI HAROLD SUTTON- Rosh HaYeshivah of the Sephardic Rabbinical College, Magen David Yeshivah and Yeshivat Moreshet Yerushalayim, in Israel.

<https://thechesedfund.com/jacobskassinchesedfund/freelizabeth>

2/4

3/13/2021 Elizabeth is Free! | The Chesed Fund

RABBI TIDHAR COHEN- Beit Horaah 'Emet Vasedek', Brooklyn, NY

RABBI MAX SUTTON Rosh Beit Din Aram Soba Jerusalem, Israel

All donations are tax deductible.

PLEASE DO NOT POST ANY NEGATIVE COMMENTS

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

She has been refused child support and her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.

Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees.

2


REFUSING A GET IS ABUSE AND IT NEEDS TO STOP!

We need to help her stay strong and help alleviate this financial burden!

Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava).

#FREEELIZABETH

Created By

 TAX DEDUCTIBLE

<https://thechesedfund.com/jacobskassinchesedfund/freelizabeth>

3/4

3/13/2021 Elizabeth is Free! | The Chesed Fund

The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund

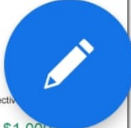
The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund
1801 Ocean Parkway
Brooklyn, NY
Tax ID: 205569592




Contact Organizer
communityagunahfund@gmail.com

Recent Donations

Anonymous Donor
1 day ago
Much hatzlaha to this wonderful family. May hashem repay them thousand fold and may Elizabeth begin a new future with this

effectively \$1,000



298. On or about March 14, 2021, the webpage content was taken down and is now not functioning, but the actual webpage link still exists and will lead people to the chesed fund site.

299. The total amount of money that I can confirm was received by this campaign is \$128,353.29(see above evidence). According to the webpage, 1066 people donated to this campaign.

XIV. DEFENDANTS MIRIAM AND RAQUEL SABZEHROO

300. Upon information and belief, these two Defendants, Miriam, and Raquel Sabzehroo, control an Instagram account named “community.news.”

301. On or about March 8, 2021, Miriam and Raquel Sabzehroo, posted on their Instagram account a picture of the webpage contents of the campaign for Elizabeth Kairey that was created by The Edmond J. Safra Synagogue; namely the free Elizabeth chesed fund link mentioned above.

302. Miriam and Raquel Sabzehroo published three separate pictures of the contents of the webpage as seen here:

9:41



72%



community.news



THIS CAMPAIGN IS ENDORSED BY RABBI 2/3
MANSOUR.

Jacob S. Kassin Hessed Fund

All donations are tax deductible

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

He has REFUSED to pay any child support and has REFUSED to give her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.



Liked by **izhaber** and **889 others**

community.news Refusing a GET is abuse and it must stop. [#freeelizabeth](#) DM for the link to donate. Endorsed by rabbi Eli Mansour Please spread the word.

<https://thechesedfund.com/jacobskassinchesedfund>



9:41



72%



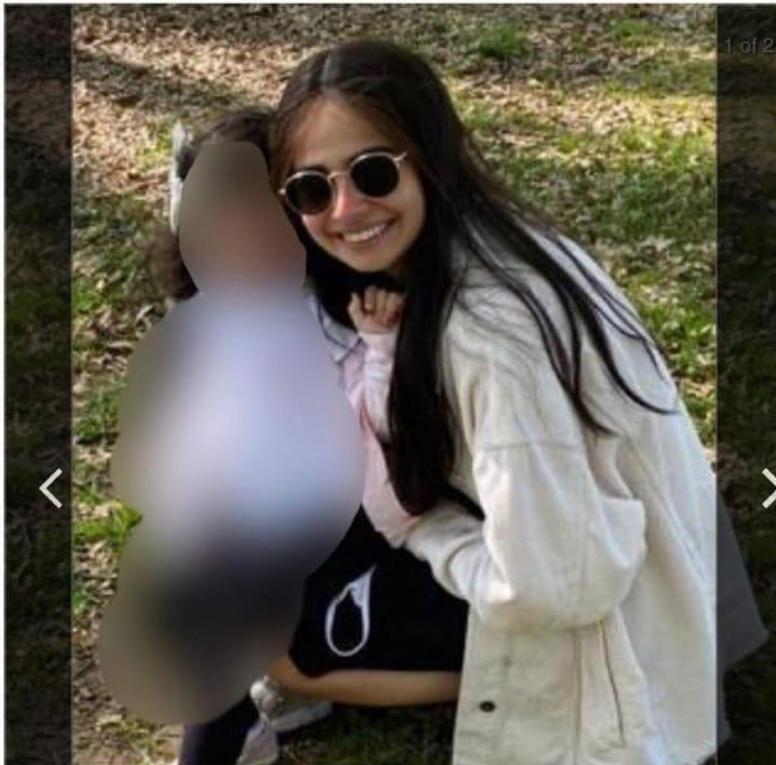
community.news



TheChesredFund

1/3

Free Elizabeth!



Liked by **izhaber** and **889 others**

community.news Refusing a GET is abuse and it must stop. [#freeelizabeth](#) DM for the link to d... more

[View all 173 comments](#)

aimeebenisti We stand with you, Elizabeth! His name should be publicized to show that both men and women of this community do not and



9:41



community.news

72%

THIS CAMPAIGN IS ENDORSED BY RABBI 2/3
MANSOUR.

Jacob S. Kassin Hessed Fund

All donations are tax deductible

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

He has REFUSED to pay any child support and has REFUSED to give her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.



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[View all 173 comments](#)

aimeebenisti We stand with you, Elizabeth! His name should be publicized to show that both men and women of this community do not and



9:41



72%



community.news



Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees.

3/3

This man is waging a relentless legal campaign against Elizabeth and her family including appeals of every decision of the civil court.

He has been instructed by the Beit Din to give a get and on numerous accounts refused.

REFUSING A GET IS ABUSE AND IT NEEDS TO STOP!

We need to help her stay strong and help alleviate this financial burden!

Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava).

Liked by **izhaber** and **889 others**

community.news Refusing a GET is abuse and it must stop. [#freeelizabeth](#) DM for the link to donate. Endorsed by rabbi Eli Mansour Please spread the word.

<https://thechesedfund.com/jacobskassinchesedfund>



304. As can be seen in the pictures above, at the time they screenshotted the campaign website, it contained the original content that was published on free Elizabeth chesed fund site.

305. The Instagram account Community.News had about 19,000 followers at the time they posted the campaign contents on their Instagram page. Currently, they have 20,000 followers. This Instagram account is extremely popular in the Syrian Jewish Community.

306. The post which contained the webpage contents received 890 likes, which means 890 different people pushed a heart button, which indicates they approved the contents of the post.

307. The description asked people to DM, which means direct message them for the link to the webpage so that they can donate to the cause and also view the pages content. These Defendants also encouraged their followers to “please spread the word” of the webpage content.

308. The comments section under this post contained many extremely harassing and threatening messages directed at me, such as, “we need to introduce beatings for these kinds of atrocities.” Said comment was made by Abraham Manopla.

309. The Community News also posted the flyer advertising the protest at Corporal Wiltshire Park located in Brooklyn, NY as seen here:



310. Community News and Adina Miles have a combined 70,000 + followers and both of these Instagram accounts explicitly joined the #free Elizabeth mission and helped formulate in-person protests against me.

XV. DEFENDANT SARI DANA

311. Sari Dana has an Instagram account called “Zensari_”. She has approximately 3,300 followers. And she posted a screenshot of the campaign webpage <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

312. The description of the post read “ refusing to give get is abuse and it must stop. Endorsed by Rabbi Eli Mansour. Link is in bio @evashammahrealty.

313. The post she posted contained the words “the chesed fund” and the picture of Elizabeth Kairey and my daughter.

XVI. DEFENDANT DEBORAH SHILOACH

314. Deborah Shiloach has an Instagram account named “dshiloach”.

315. Ms. Shiloach posted a screenshot of the campaign from webpage <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

316. The post she posted contained the words “the chesed fund” and the picture of Elizabeth Kairey and my daughter.

317. The description of the post read “the crazy world we live in.”, implying I am doing things that are crazy and evil and all the other pejorative comments made about me that was posted for millions of people to see.

318. Ms. Shiloach has approximately 2,000 followers.

XVII. DEFENDANT ELIZABETH KAIREY

319. Elizabeth Kairey is my wife.

320. Elizabeth Kairey, through her attorney Jay R. Buttermann in our divorce action, accepted responsibility for authorizing/approving the webpage

<https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

321. Elizabeth Kairey went on Instagram on two separate person's accounts; namely, Dalia Oziel and Abraham Manopla, thanking them both for their efforts in helping her extort the GET from me. I have been furthered advised that Dalia played an integral role in the public humiliation campaign against me.

322. Elizabeth Kairey, through her attorney Jay R. Buttermann who represents her in our current divorce action in Supreme Court Kings County Index no: 53206/2018, confirmed that she received the money from this campaign on this webpage

<https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

323. Upon information and belief, Elizabeth Kairey, who is a blood relative of Rabbi Eli Mansour, the head Rabbi of the Edmond J. Safra Synagogue, directly conspired with each and every Defendant in this matter.

324. Upon information and belief, Ms. Kairey is the one who fed the defamatory information to the Defendants and asked them to publicize it in her effort to enrich herself and defame and intimidate me.

325. Only one week prior to this defamation campaign did Ms. Kairey send a man named Michael Wahba to harass and intimidate me at my parents Brooklyn home and I have two

separate criminal charges pressed against Mr. Wahba with the NYPD. Said actions took place in NY and a separate action was filed in Supreme Court Kings County regarding said occurrences.

326. Back in January 2021, the organization ORA, sent me an email, advising me that Elizabeth Kairey contacted them, and they wanted to discuss my divorce proceeding with them.

327. I warned them to leave me be as they were contacting me concerning a matter that had nothing to do with them.

328. Upon information and belief, Elizabeth Kairey was spreading information throughout the community that I abused her sexually and physically.

329. I have also been repeatedly advised by numerous individuals that Ms. Kairey claimed I locked her in a basement for 2 weeks without food while we married to each other(I never did such thing).

330. I have been informed by my uncle, who has spoken to representatives of Ms. Kairey, that Ms. Kairey had been in direct communications with several of these Defendants.

331. Ms. Kairey didn't simply authorize the defamation and harassment campaign against me. Rather, she directed it and caused it to come to fruition.

332. I believe that having Ms. Kairey testify under oath as to her involvement with this campaign will reveal that she was deeply involved with this campaign, and she played a vital role in its creation.

333. Upon information and belief, back in the summer of 2018, Ms. Kairey, severely defamed me on Instagram using fake Instagram accounts by posting comments about me stating I am pathological liar and abuser.

334. On the video that Kairey appeared on with Manopla, Kairey stated that she was very much appreciative of what the community did for her.

335. Ms. Kairey stated that the mission was not complete. She said that there are other women who need help getting a Get. She mentioned women by specific names.

336. On the video with Oziel, Kairey stated that she is very good friends with a Chava Sharabani.

337. Sharabani has publicized her GET issue with her husband all over the internet with most people claiming that she is responsible for the start of this “agunah movement.” One search of #freechava on google will reveal a plethora amount of information regarding Chava’s public humiliation campaign of her husband Naftali Sharabani.

338. Although Manopla is not listed as a Defendant here, Manopla and others call themselves the “get busters”, apparently referencing the group name they have coined for themselves. I also retain evidence that Manopla and Mansour were in direct contact with each other throughout the week of March 8, 2021, in their mission to extort a Get from me and Dibo Hafif.

339. As the name connotes, Manopla and others will bust up the men in order to extort a GET.

330. One of their slogans is “who you gonna call, the get busters!”

331. I personally anonymously reached out to some of these “get busters” and they explicitly advised me that they do not get involved in any case unless the wife gives them explicit permission and herself reaches out to them.

332. On March 11, 2021, around 9:30pm, a large party was held by Elizabeth Kairey's home at 1531 East 3rd Street, Brooklyn, NY 11230, where she and all her family and friends gathered to celebrate her receiving a Get from me.

333. There were several live Instagram videos commenced during this party and people were drinking alcohol and celebrating their victory.

334. Additionally, Manopla, who has a separate Instagram account he created to sell merchandise with his logo "Mexican pacino" and "get buster" on it, had several live streaming videos with guests appearing at the party.

335. My wife was one guest on the show as was her mom, her cousin Alex Missry and Rabbi Eli Mansour, the head of the Edmond J. Safra Synagogue.

336. Rabbi Eli Mansour was also pictured with alcohol in his hands standing next to my wife's cousin, Sam Beda, who was wearing a shirt with Manopla, with the title Get Buster as seen here:



337. Throughout the entire week, Manopla kept advising the thousands of people watching his lives, that Rabbi Mansour promised he would come on as a guest on live streaming Instagram video if they got a Get out of me or Dibo.

338. Sure enough, Rabbi Mansour came through with his promise.

339. When Manopla confronted Rabbi Mansour about putting his name behind the campaign against me, Rabbi thanked Manopla and told him that “our work is not done.” And “Abe, let’s go partners.”

340. When Manopla questioned Rabbi Mansour about the other women who need Gets, Rabbi Mansour then referred to me and the other men he is seemingly pursuing by stating “we will knock em off like bowling pins.”

341. Mansour specifically stated that sometimes men need help and are oppressed, thereby implying that Elizabeth was the victim here and therefore deserved his aid.

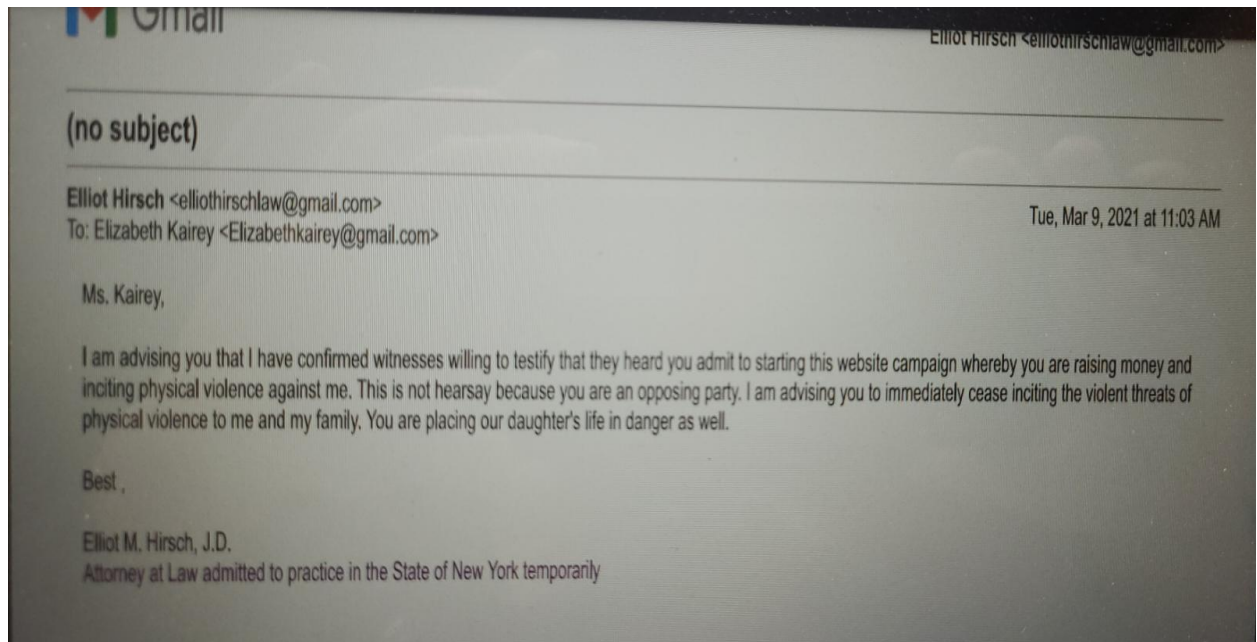
342. Being that my wife was celebrating a Get party, with merchandise flying around with Manopla on it, and having the individuals present at said party who participated in the harassment against me, and Elizabeth explicitly thanking those involved, I believe a reasonable juror would conclude that the Defendants, whom many of them were present at said party, were suborned by Elizabeth Kairey to intimidate me into giving her a Get.

343. Alex Missry, who has been intimately involved with aiding my wife’s mission of extorting a Get from me, appeared on said Manopla live video. Missry specifically said that some “shout outs” were in order when Missry began praising and thanking Manopla for his role in this conspiracy.

344. Missry stated that Ricky Hidary(whose wife is a principal at Yeshiva of Flatbush High School), Rabbi David Maslaton and Rabbi Harold Sutton played integral roles “behind the scenes.”

345. Missry thereby explicitly confirmed that these people and all of these Defendants were all part of one big conspiracy working together to extort a Get from me.

346. Being that Kairey approved the chesed fund website and therefore was aware of its content, she certainly knew that said site would place me in fear for my safety and her continuous contacts with the Defendants in this case make her liable for various causes of actions listed later on this complaint. Additionally, Kairey cannot claim she had no notice of the website nor its content as I put her on notice see here below:



XVIII. DEFENDANT SHERRY CHERA HALABI

347. Sherry Chera Halabi has an Instagram account called “spiaggiajewels.”

348. Said account has approximately 2,000 followers.

349. On or about March 8, 2021, Sherry Halabi posted a screenshot of the campaign from webpage <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

350. The post she posted contained the words “the chesed fund” and the picture of Elizabeth Kairey and my daughter.

351. The description of said post stated “this is not ok. Free Elizabeth now.”

352. In essence, Halabi’s message was directed to me and ordered me to free Elizabeth, meaning give my wife a Get, under threat of physical violence, as the website campaign explicitly had direct threats of violence to my body and also threatened mob riots at my home.

XIX. DEFENDANT DALIA OZIEL

353. Dalia Oziel has an Instagram account called Daliaoziel.

354. Dalia Oziel has approximately 39,000 followers.

355. On or about March 8, 2021, Dalia posted a screenshot of the campaign from webpage <https://thechesedfund.com/jacobskassinchesedfund/freeelizabeth>.

356. The post she posted contained the words “the chesed fund” and the picture of Elizabeth Kairey and my daughter.

357. Dalia Oziel appeared in pictures with Adina Miles.

358. The description of the post read “TEARS OF JOY!!!!!!ELIZABETH IS FREED!!!!!!!,MAY THIS BE THE FUTURE FOR ALL AGUNOS!!!!!!!!!!”

359. An Agunah is a term that Dalia and these Defendants inappropriately applied to my wife Elizabeth Kairey and thereby defamed me.

360. Elizabeth Kairey is not and was never an Agunah, but the campaign and these Defendants published information that stated she was an Agunah.

361. Said term Agunah is used by the media in a way that causes much hatred towards the husband of the “agunah”

362. On or about March 11, 2021, Dalia Oziel commenced a live video on her Instagram account.

363. On said live video, my wife Elizabeth Kairey was brought on by Dalia and they celebrated their victory together in front of tens of thousands of people.

XX. EVA SHAMMAH

364. On or about March 9, 2021, Eva Shammah, posted on her a picture of the contents of the <https://thechesedfund.com/jacobskassinchesedfund/freelizabeth>.

365. On March 9, 2021, Eva Shammah posted three separate pictures on her Instagram of the contents of said webpage.

366. Eva Shammah’s Instagram account is called “evashammahrealty” and she has approximately 8,500 followers and uses her Instagram account to publicize her real estate business.

367. Eva Shammah’s post of the free Elizabeth webpage garnered 457 likes.

368. The description of the post stated “Refusing a GET is abuse and it must stop. [#freeelizabeth](#) Link is in my bio to donate. Endorsed by rabbi Eli Mansour Please spread



the word.”

369. Still till today, the post is still up on Eva Shammah’s Instagram account thereby continuously defaming me.

370. Many of the comments posted by people under this post were ridiculing and humiliating me. One comment read “nobody should be using this boy’s father. He is a pain management doctor. Nobody.”

371. This post was referencing my father Dr. Jonathan M. Hirsch, who has a pain management private practice in Brooklyn, New York.

372. Another comment posted by “gracemarcus1” stated “ I think a group of sy moms should beat the ***** out of him(sy is acronym for Syrian) with all due respect the rabbis can’t do that. After he is beaten up let his father give him pain management.” (this was another threat of violence directed at me)

373. After this post, a woman named “Shani. Marcus” stated “I just laughed out loud. Love you”, in reply to Grace Marcus’s comment. Then Eva Shammah herself replied to Shani Marcus’s comment with “me too. I can’t breathe”.

374. Ms. Eva Shammah’s comment of “I can’t breathe” was euphemistically being used as connoting something that caused so much laughter that it prevents a person from breathing properly.

375. It is reasonable to any person that this thread of comments is derisive and intentionally humiliating me, Elliot Hirsch, and my father Dr. Jonathan M. Hirsch.

376. Like the Sabzehroo Defendants, Eva Shammah’s screenshot of the free Elizabeth webpage was made when the webpage stated I failed to pay any child support and appealed every decision of my divorce action with Kairey.

377. Eva Shammah confirmed to me via text that she posted the contents of the chesed fund campaign on her Instagram account.

378. Eva Shammah texted me that Rabbi Eli Mansour, the head of the Edmond J. Safra Synagogue, approved of the defamation campaign and advised her to publicize its content.

XXI. RABBI ELI J. MANSOUR

379. Rabbi Eli Mansour is a world renown Orthodox Jewish speaker who lectures and teaches Torah to hundreds of thousands of Orthodox Jews worldwide.

380. Mansour and Mansour's wife are close relatives of Elizabeth Kairey's father, Isaac Kairey.

381. Rabbi Eli Mansour explicitly authorized, supported, and encouraged the free Elizabeth chesed fund defamation campaign and he also encouraged, aided, and encouraged nightly protests at my personal residence and residence of Dibo Hafif. Mansour even went on a live with Manopla and evinced their partnership and explicitly stated that he had a whole list of men he was going to knock off as he did to me, claiming to be on some sort of crusade for perceived religious injustices.

382. Mansour holds a position of authority in society as a member of the clergy and head Rabbi of a large Jewish Temple; namely Edmond J. Safra Synagogue Inc.

383. The Syrian Jewish Community has four major leading Rabbis; namely, Rabbi Shlomo Diamond, Rabbi David Ozeri, Rabbi Meyer Yedid and Rabbi Eli J. Mansour.

384. None of the aforementioned Rabbis participate in Beth Din proceedings and they are not qualified to issue rulings on divorce cases.

385. I believe that all of the above Rabbis will agree with me that they are not authorized to decide Jewish law matters concerning validity of a Get. And, in fact, Mansour has publicly stated he is not knowledgeable in the laws of Jewish divorce. But that didn't stop him from coercing me to give a Get.

386. Out of those 4 Rabbi's only Rabbi Mansour participated in the encouragement/support/endorsement and spreading of the defamation campaign launched against me.

387. In fact, Rabbi Ozeri helped me and my family by not allowing the mob to come down the block at the protest in Brooklyn near my dad's medical practice.

388. Ozeri promised the mob I would give a Get that night, March 11, 2021, so that they wouldn't come down the block to my father's office.

389. I saw the videos of Ozeri telling the mob he would come the next day to protest if the Get wasn't given that day.(this video was posted on the world wide web by several different people/magazines and Ozeri was quoted in several news articles as well)

390. Dozens of posts were spread throughout Instagram advising the public to completely ostracize me from society as a regular citizen.

391. These posts were spread on Instagram to hundreds of thousands of people and Rabbi Eli Mansour's name appeared on the posts as seen here:

Rachel Goldenbu...



1 minute ago

Rabbi Eli Mansour has
aprooved the sharing of this
post.
[#freeelizabeth](#)



GET REFUSER ALERT
ELLIOT HIRSCH >
JUSTICE FOR ELIZABETH

MEET ELLIOT HIRSCH

HE HE HASN'T GIVEN HIS WIFE ELIZABETH A GET IN
CLOSE TO 5 YEARS. THEY BOTH HAVE A DAUGHTER
TOGETHER AS WELL. PLEASE SHARE THIS STORY TO
GET THE WORD OUT.

THE MORE PEOPLE SHARE THE MORE CONTROL AND
POWER WE HAVE BY BY LETTING THE WORLD KNOW
WHO THIS MAN REALLY IS HE SHOULD NOT BE
ALLOWED INTO ANY SYNAGOGUES, RESTAURANTS,
GROCERY STORES ETC. HE SHOULD NOT BE
SERVICED AT ALL IN ANYWAY SHAPE OR FORM
WHATSOEVER.

392. Rabbi Eli J. Mansour, certainly had to give his prior approval for his Synagogue to create the free Elizabeth webpage campaign.

393. Mansour used these Defendants to do his dirty work attempting to shield himself from liability.

394. Mansour has been the one getting Elizabeth Kairey the funds to sue me for the last four years in Supreme Court New York.

395. Mansour has publicly admitted to having a strong affinity to mob stories, especially Jewish Mafia, evidencing his sickness and grandiose impression of himself.

396. Mansour was in direct contact with Beda, Kairey, Shammah, Community News, and Manopla, directing them how to spread the free Elizabeth campaign that he endorsed and allowed his Synagogue to create.

397. Mansour is the criminal mastermind behind the free Elizabeth campaign and was also behind the riots attacking Mr. Dibo Hafif.

398. Mansour publicly admitted that he was responsible for this entire free Elizabeth mission and actually still expresses his content and satisfaction with his involvement in this story.

399. On March 9, 2021, my father, Dr. Jonathan M. Hirsch, went to the Agudath Yisroel of Madison Synagogue to meet with Rabbi Yisroel Reisman, a Rabbi who is extremely well respected and considered one of the foremost leaders for Ashkenaz Jews in the Tri-State New York area.

400. My father went to the shul to meet with Rabbi Reisman for help how to deal with the Free Elizabeth campaign that Mansour publicly endorsed.

401. Rabbi Reisman and Rabbi Mansour were the two rabbis who presided over the marriage of me, and my wife and they are well acquainted with each other.

402. Once my father got to the shul my father phoned Mansour and a 3-way conversation ensued, with Rabbi Reisman standing next to my dad.

403. Rabbi Reisman advised Mansour that what Mansour was doing was strictly forbidden under Jewish Law and that he must cease the free Elizabeth campaign.

404. Under Orthodox Jewish Law, publicly embarrassing someone with defamation is equated with murder.¹²

405. Additionally, a *Siruv* was never issued against me by any Beth Din, the Hebrew term for rabbinical court.(See Exhibit D attached hereto for rabbinical documents relating to this matter).

406. Moreover, there was no Beth Din that stated it was permitted to shame me or coerce me to give a Get(which is why ORA was not involved in this fact pattern). In fact, two separate and independent Beth Din's issued letters stating it was forbidden under Jewish Law to pressure me in any way whatsoever for the purpose of extracting a Get from me. (see exhibit D attached hereto)

¹² https://halachipedia.com/index.php?title=Embarrassing_Others

407. Notwithstanding all of the above, Mansour told Rabbi Reisman that he himself unilaterally decided that it was time I give Elizabeth a Get and that he would not back down and take down the webpage.

408. After this meeting, my father came home and told me all that occurred.

409. I myself then called Rabbi Eli Mansour and we had a call that lasted approximately 8 minutes.

410. Mansour told me on the call that he truly wished I gave a Get already and that he wanted to make sure I was “happy”, and my “rights” were taken care of.

411. He advised me to go to Rabbi Reisman and tell Rabbi Reisman what terms I want to settle on my divorce matter but that they had to be “reasonable.”

412. Apparently, Mansour was in charge of what divorce terms qualified as reasonable.

413. Mansour wanted to try to force me to settle my pending divorce on terms he would deem appropriate because there is a Jewish Law that states once a Get is given the wife is forbidden to take her ex-husband back to secular Court for any monetary claims(which is exactly what my wife is currently doing).

414. According to Manopla, Mansour is the most popular Rabbi in the entire Syrian Jewish Community. I agree with Manopla.

415. Mansour is widely recognized as a Jewish intellectual scholar even amongst the Ashkenaz Jewish communities.

416. He is a sought-after speaker in Jewish Orthodox communities world-wide.

417. Mansour and his Temple, the Edmond J. Safra Synagogue started this campaign against me, and I had absolutely no chance of survival.

418. Not only was I up against the juggernaut force of Mansour and his Shul but they then had all of these other highly popular Defendants aid them in their objective.

419. To say this case is a story resembling the biblical incident between David and Goliath would be an understatement.

420. This case is more like David vs. twenty-five Goliaths. And, unsurprisingly, in this story, David loses.

421. After the campaign came out, the next day I sent my wife an email and I also contacted Mansour pleading with them to take down the webpage campaign. They both refused.

422. I did my absolute best to quell this mob attack by spreading the Beth Din documents that I have attached in the exhibit section below.

423. In fact, Dibo Hafif was also forbidden to be coerced into giving a Get and he did the same thing as me by spreading his own Beth Din documents publicizing the fact that it was forbidden under Jewish Law to coerce him to give a Get.

424. But both our efforts were to no avail and fell on deaf ears. We had no chance up against the powerful, famous, and extremely well-respected Rabbi Eli J. Mansour and his Shul, Edmond J. Safra Synagogue.

425. I was not defamed by ordinary private citizens. I was defamed by the most powerful and authoritative figures in an entire Orthodox Jewish community consisting of at least 250,000 Jews.

426. Rabbi Eli Mansour is the most powerful Rabbi in the entire Syrian Jewish Community.

427. His followers are all extremely affluent and Rabbi Mansour's participation in this free Elizabeth campaign is the sole reason Kairey was able to raise so much money in such a short time.

428. Mansour completely abused his position of power as a Community leader and used it to torture and terrorize me and Dibo Hafif.

429. Edmond J. Safra Synagogue certainly would not have opened the campaign without Mansour's explicit approval.

430. Mansour is the head leader of the Shul and without his direction and leadership this entire story would never have occurred.

**FIRST CAUSE OF ACTION-INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS**

431. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered "1" through "430" herein with the same force and effect as if the same were set forth at length herein.

432. On a claim for intentional infliction of emotional distress, the plaintiff must prove that the defendant acted intentionally or recklessly; the defendant must have either intended to do the act with the intent to produce the emotional distress or acted recklessly in deliberate disregard of a high degree of probability that emotional distress would follow. In order to establish a claim for intentional infliction of emotional distress, the plaintiff must prove that

defendant's conduct was extreme and outrageous, and the conduct must be so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community. Plaintiff seeking to recover for intentional infliction of emotional distress must prove that defendant's conduct was a proximate cause of plaintiff's emotional distress.

433. On a claim for intentional infliction of emotional distress, the emotional distress suffered by plaintiff must be so severe that no reasonable person could be expected to endure it.

434. On a claim for intentional infliction of emotional distress, when the conduct is directed at the plaintiff, she need not prove physical injury; it is sufficient that the conduct produced emotional distress that is severe.

435. All the Defendants engaged in conduct deliberately and expressly intended to cause me such severe emotional distress that I would have no option but to give in to their demand that I give my wife a GET.

436. Many of the Defendants acknowledged that their actions were intended to coerce me into giving my wife a Get. There is no question that these Defendants acted with malice.

437. The Defendants knew that I would not be able to handle such intense and severe emotional distress and that is exactly why they engaged in these actions.

438. Even Manopla stated in one of his lives that “elliot won’t be able to handle the crowd. He is going to give the get.” Manopla also stated in another video that no human being on this earth could withstand the pressure that was being applied to Dibo Hafif and I and that he “felt bad” about intentionally doing this to us but that it had to be done in order for us to give a Get.

439. The Defendants explicitly encouraged and incited violence directed at me by transmitting the free Elizabeth campaign and causing the threats to be sent continuously to me from March 8, 2021, to March 14, 2021.

440. The Defendants acted with actual malice and collaborated with each other in an extremely coordinated and deliberate attack in order to extort a Get from me.

441. The Defendants explicitly mentioned why they were engaging in their actions.

442. The Defendants conduct is extreme and outrageous behavior that has zero tolerance in a civilized community.

443. The Defendants conduct was intended to cause me such severe emotional distress for the purpose of extorting me for a Get.

444. Because of these Defendants I was forced to flee my personal residence.

445. The Defendants actions were not only directed at me but at my extended family members as well in order to cause me internal family strife, which would subject me to additional emotional distress and which they succeeded in doing so.

446. The Defendants did not allow my family and I to live in peace and tranquility as is our rights as citizens of the United States of America. I had no choice but to flee my home and I was threatened with daily mob riots at my home and the home of my parents, which left me nowhere to go.

447. The Defendants and others did mention, that regardless of if I was staying at home, they would continue to riot outside my family properties.

448. My relationship with my family deteriorated overnight because of these Defendants and I could not allow this mob to attack the homes of my father and they successfully extorted the Get from me.

449. I was faced with the prospect of living as a nomad and giving up my residence because of the threat of nightly riots outside my home.

450. I called the FBI, but they never followed up on my complaint.

451. My mother and father's reputation were being tarnished as the "parents of a get refuser" and my mother was about to be fired from her position as a teacher in a local Syrian Jewish Community school.

452. It is noted that the Syrian community uses a derogatory term for Ashkenaz Jews¹³ such as myself(my dad is of German descent- his father is from Berlin and escaped Nazi Germany in 1939); namely, a J-dub and Manopla called me a piece of shit J-dub on one of his lives, which further evidences the constant, ongoing emotional distress I am subjected to because of the actions the Defendants committed against me.

453. The Defendants all encouraged and spread my personal phone number to thousands of people for the purpose of having myriads of strangers bombard my cell phone with calls and texts of extortionary threats.

454. As mentioned in the prior portions of the complaint, these Defendants participated in public illegal protests where they publicly accused me of being an abuser and kidnapper all for the purpose of causing me severe and intense emotional distress.

¹³ See <https://www.nytimes.com/2007/10/14/magazine/14syrians-t.html>

455. The Defendants all encouraged and threatened me with nightly mob riots and threats of violence by their either participating in the protests or separately and independently transmitting threats of violence and defamation at me via a facility of interstate commerce.

456. All Defendants falsely accused me of being an abuser and dead-beat dad who never paid child support. The Defendants publicly stated these defamatory comments in order to cause me such severe and intense emotional distress for the purposes of extortion.

457. Major news magazines such as The Vogue and The Guardian wrote up stories about the events that transpired during the course of the free Elizabeth campaign.

458. The entire purpose of the Defendants actions was to violate my freedom of religion and force me to do something which is constitutionally protected under my first amendment right of freedom of religion.

459. There can be no tolerance in a civilized society for individuals to engage in coercive, harassing, and threatening actions in order to force people to do things regarding their religious beliefs.

460. The conduct of the Defendants warrants severe punishment.

461. Solely because of the actions of these Defendants I am now in need of continuous therapy and trauma treatment.

462. My name has been permanently tarnished as an abuser of women.

463. A search on google of my name will reveal the term Get refuser.

464. The videos of the protests and much of the harassing comments directed at me are still up on Instagram and searchable under the hashtag #freeelizabeth.

465. My reputation is permanently damaged, and I will now suffer severe emotional distress the rest of my life because of the Defendants.

466. Many of these Defendants are widely popular and hold powerful positions in society and therefore merit strong punishment as the case law is clear that powerful public figures are especially duty bound under the intentional infliction of emotional distress cause of action.

467. On May 12, 2021, I received a letter from Ashley Egleston, a licensed counselor at Ocean Township Human Services which states “ Dear Mr. Hirsch, on May 5, 2021, you had participated in a consultation at this agency. Information presented during this consultation indicates the need for further assessment by way of a psychological evaluation. It is also recommended that you present for a psychiatric evaluation to determine if you are a candidate for medication. This recommendation is not in the agency’s scope of practice. As such, it is recommended that you present to an agency providing both of these services to best serve you. Below you will find agencies that historically provided both services. “

468. I contacted both of the service providers that Ms. Egleston recommended to me. Only one of them got back to me, namely, CPC behavioral healthcare. After speaking to CPC, they recommended me to Penn Medical Princeton Health.

469. I have spoken to the intake unit at Penn Medicine Princeton Health, and they have determined that I qualify for the men’s trauma therapy program. However, said program is fully booked and they have placed me on a waiting list.

470. I am in deep need of therapy due to the actions of the Defendants that took place the week of March 8, 2021, and the permanent posts now spread out on the internet that associate me with being a get-refuser and causing Elizabeth to be an Agunah.

471. Being that I am unemployed, I receive Medicaid insurance from New Jersey, and it took months of searching but I have finally found a Dr., a licensed psychologist, who accepts Medicaid and I have commenced weekly therapy sessions with said Doctor.

472. Because of the Defendants conduct I now have immense trouble sleeping, eating, socializing, exercising, and doing daily chores around the home.

473. Because of the Defendants actions I now suffer from incessant depression, nightmares and difficulty being engaged and functioning as a regular person in society.

474. Because of the Defendants actions I now suffer from severe anxiety, trauma, nightmares, hypervigilance, flashbacks, insomnia, panic attacks, inability to work, and fear.

475. Prior to March 8, 2021, I did not suffer from any of these conditions. However, none of my current symptoms affect my relationship with my daughter and I am fully able to parent and have custody of my child.

476. My temporary license that authorized me to practice law, which was signed by Presiding Justice Alan D. Scheinkman of the Supreme Court of New York Appellate Division 2nd Dep. has expired this August 2021.

477. Although I have not made any money in my position as a temporarily lawyer I was able to advertise and promote myself to provide legal services and my name spread and I did receive several phone calls with people seeking counsel.

478. Although I did not end up representing anyone, I did plan on taking the bar this July 2021 and then start practicing as a fully admitted attorney.

479. I believe that I was going to be able to start representing people after I passed the bar in July. But my reputation in the legal field has now been irretrievably damaged as the general public considers me an “abuser” and a “fake lawyer” and this is only because of the actions of each and every one of the Defendants.

480. It is submitted that I have been diagnosed with severe ADHD since about the age of 8 years old.

481. I was recertified with ADHD not so long ago and I received extra time on both my LSAT and all law school examinations. I also received a private room for all examinations due to extreme difficulty in my ability to focus.

482. Because of the actions of these Defendants I now also require monthly appointments with a neurologist and after having searched for many months due to my insurance not being accepted by many Jersey doctors, I have thankfully found a neurologist who I have seen already several times and who has prescribed me medication and will need to continue seeing said Dr. for an indefinite period of time.

483. Laurie Beda, Norma Tawil, and the Yeshiva of Flatbush are all aware of my ADHD condition and should be held accountable for knowingly causing me additional stress that they knew would be exacerbated by my ADHD condition.

484. Because of the actions of these Defendants during March 2021, which was the time I was planning on dedicating to signing up for the Bar Examination and concluding my

studies, I was effectively precluded from doing so by suffering the intense emotional distress I was subjected to by these Defendants.

485. I have a loss of future income as an attorney because of the Defendants actions in destroying my reputation and for causing me such emotional distress that I was unable to study properly for the Bar exam of July 2021. I now will not be able to an admitted attorney until at least the year 2022 and my temporarily license has now expired.

486. Because the Defendants brought my divorce controversy to the public attention and because Laurie Beda published the contents of the webpage(which contained threats of violence to my body and threats of mob riots for express purpose of intimidating me to give my wife a Get), my wife gathered approx. \$128,000 in order to, *inter alia*, continue her lawsuit against me, which includes her attempt to eradicate me from our daughter's life.

487. I have been suffering parental alienation at the hands of Elizabeth Kairey as evidenced by a document signed by Bes Din Ohr Halacha dated in April 2019.

488. To give just one example of the emotional distress that I am still subjected to because of the Defendants, after not having attended Temple services in over 4 months because of my anxiety and trauma, during July 2021, I was invited over by a long-time friend to his home for a Sabbath meal and prayers afterwards. When I arrived at the home there was approximately 25 men sitting at the dining room table. At one end of the table was a man named Isaac Cohen who is a member of the Shomrim Patrolmen, a Brooklyn neighborhood watch group that is a quasi-type of police enforcement. Shomrim works closely with the NYPD.

489. Mr. Isaac Cohen, who has publicly commented on numerous lives of Manopla that I should "be a man and pay child support", immediately began hurling threats at me. He

stated that if I came near him I would not be able to walk out of the home that night. He further started screaming that I am an asshole and piece of shit. He repeatedly berated me that I should “pay child support” and that I am not a man. After about 25 minutes of non-stop verbal harassment, one of the other men in the home advised Mr. Cohen that he must shut his mouth. At that point, the meal was over, and prayers began. I came home dejected and emotionally scarred.

490. On another occasion, I took my daughter to the pizza store in Brooklyn, NY and in the pizza shop I was being stared at by a random woman. I asked her if I could be of assistance, and she said she recognized me from all the Instagram posts and asked me how I was able to walk around in the neighborhood after what happened to me. She said if I were you I would not be able to walk outside in public. Again, I felt dejected and emotionally scarred.

491. Currently in our country we have many riots and protests against systemic racism and other general wrongs but nothing resembling the conduct of these Defendants.

492. Many comments from members of this mob were published on the Instagram live videos mentioning the BLM protests and that if BLM riots are allowed then these Get riots should likewise not be a problem.

493. The Chessed Fund organization did not control the content of the webpage link rather it was the Edmond J. Safra Synagogue who is responsible for everything that was published on said webpage.

494. The Edmond J. Safra Synagogue controlled each and every statement published on said webpage and had the ability to remove or leave any content that was stated on said page.

495. All the Defendants played an integral role in intentionally and explicitly spreading the free Elizabeth chessed fund campaign in order that the entire Jewish Orthodox population

view me as an abusive, evil, vile human being(through the defamation) thereby causing all those associated with me to be forced to disassociate from me, which would leave me completely ostracized from the Jewish Orthodox society that I have been a part of my entire life.

496. Indeed, I lost many friends because of this campaign, and it caused me severe strife even within my own family.

497. These Defendants also published and spread said webpage in order to galvanize and incite Orthodox Jews, especially in the Syrian Jewish Community, to send me threats of violence and harassing and alarming messages for the express purpose of helping Elizabeth extract a Get from me.

498. Indeed, because of this campaign I received dozens of messages and phone calls harassing me and threatening me with violence because I had not given Kairey a Get.

499. To give just a couple examples, on March 8, 2021, at 11:09pm I received a text message from John Doe 1 stating, “give the get and stop being such a piece of shit”, “you’re a sick sick man.”

500. On March 8, 2021, at 9:59pm, I received a text message from John Doe 2, stating “how can we bring awareness to this cause?”, “you rat bastard, you’re a piece of shit and you better lock the doors tonight.”

501. On March 8, 2021, at 8:28pm, I received a text message from John Doe 3, stating “ you are probably too busy abusing women, give a get you piece of shit deadbeat.”

502. On March 8, 2021, at 7:55pm, I received a text from John Doe 4, stating “you don’t know who I am, but I think you should know your situation is spreading through the

community like wildfire and you should be scared of the outcome. There is not a single person who sympathizes or will sympathize with a despicable disgusting an evil person like you. The place you have earned in hell should the scare the living daylight out of you. What you're doing to Elizabeth is tantamount to murder. You're an animal who is unworthy of life. Do the right thing before it's too late."

503. On March 10, 2021, at 9:50am, I received a text message from a Mrs. Tawil, a former acquaintance of mine, who sent me a copy of the free Elizabeth chesed fund campaign link with a private message to me stating "in merely a few days people have collected almost \$100,000 for your ex-wife and daughter. Your number is getting around and people are going to do much more than donate very soon. If you even have shrivel of mercy think of the daughter you abandoned and what a repulsive vision of a father she has to look at. After all the abuse, leave off with a shrivel of self-respect. Give people a reason not to spit in your face when they see you."(See Exhibit E attached hereto of screenshot messages)

504. The Edmond J. Safra Synagogue Inc. created and published the words "help free Elizabeth" on this webpage.

505. It is a bona fide fact that I did not kidnap Elizabeth Kairey and hold her for ransom. Therefore, donating money cannot be said to be what "help free Elizabeth" is requesting.

506. Accordingly, the words "help free Elizabeth" cannot mean anything other than the following: send Elliot M. Hirsch, the husband of Elizabeth Kairey, alarming and threatening messages in order to harass and intimidate him into giving Elizabeth a Get.

507. To buttress this meaning, the Court can look at what Adina Miles stated on her posts on Instagram with the campaign title “free Elizabeth”, which Edmond J. Safra Inc. coined said term.

508. Adina Miles(the Flatbush Girl on Instagram), who is responsible for helping the free Elizabeth campaign organize live-in person protests against me, explicitly stated on her Instagram posts that **activism works, pressure works** see here:

Elizabeth is Free

one down,
hundreds to go.

@flatbushgirl



Liked by **juniors_jewels** and **3,586 others**

flatbushgirl Social media works.

Activism works.

Pressure works.

⚠️ Attention Get Refusers ⚠️

YOU'RE NEXT.

We will have you fired from your job.

We will publicly humiliate you.

We will find ways to have you arrested.

And we will not rest until every prisoner is set FREE.

509. Additionally, the webpage itself contained threats of violence towards me and threatened me with physical gatherings in my presence in order to scare me into giving Elizabeth a Get, in which they were ultimately successful in accomplishing.

510. It is undeniable that the webpage encouraged and solicited the public to harass and threaten me to give my wife a Get. And indeed, the webpage had a feature to easily share its content by simply clicking a “share” button.

511. However, the Edmond J. Safra Inc. would not have been successful unless they received help from their associates; namely these other Defendants in this case.

512. The Defendants aided the Edmond J. Safra Inc in spreading its message published on the chesed fund free Elizabeth campaign to hundreds of thousands of people, which caused me to receive additional communications threatening me with violence.

513. Elizabeth Kairey was the one responsible for not only approving the creation of the site but for giving the Edmond J. Safra Inc the content to publish. She also continuously notified her associates as to whether or not she received a Get from me, and by doing so, she knew that would result in her associates continuing their harassment of me. She played an integral role in this campaign.

514. The express purpose of the chesed fund free Elizabeth campaign page was twofold A) garner money for Kairey and B) threaten and intimidate me until I have such severe emotional distress from said threats that I would have no choice but to give Kairey a Get.

515. The Defendants are all guilty of causing/transmitting an alarming communication to be communicated to me via a facility of interstate commerce; namely the threat of “lets break his legs” which I received in the State of New Jersey.

516. The Defendants published these threatening messages in a public forum and thereby caused me additional emotional suffering by having the public see the threats issued to me.

517. Hundreds of people ridiculed me on Instagram videos, with thousands of people viewing, solely because this webpage decided to publicly accuse me of abusive behavior towards my wife and encouraged the masses to threaten me into giving my wife a Get.

518. Because of this webpage campaign, people like Abraham Manopla, publicly stated in front of thousands of people that I sexually and physically abused my wife.

519. During the months of May 2021 and April 2021, another man named Murray Betesh commenced his own live videos where he would ridicule me with various third parties and urge the public to completely disassociate themselves from me and not hire me for any job, which is exactly what this webpage was designed to do.

520. All these third parties lowered their estimation of me because of the free Elizabeth chesed fund campaign and that caused me untold emotional distress.

521. I have suffered severe emotional and psychological distress because of the intentional actions of these Defendants.

522. Because of the intentional acts of the Defendants I am now in need of continuous therapy and trauma treatment as described prior.

523. What the Defendants did is a violation of obstruction of persons in the free exercise of religious beliefs. Such behavior is intolerable in a civilized society and must be punished with extreme measures in order to prevent them from happening again.

524. Most of these Defendants, as seen in the facts portion above, not only republished the content of said campaign, but they encouraged others to aid the cause and donate to the campaign and created additional forums where I was threatened with outright violence.

525. These Defendants helped aid the Edmond J. Safra spread its content by not only republishing the content and posting links to the campaign but by expressly encouraging people to join the cause and harass me into giving my wife a Get.

526. No human being on this planet could have withstood the intimidation and public threats of violence that I received.

527. I suffered from shock and trauma during that week that have persisted to this day.

528. Even some of the people involved with the harassment of me were emotionally drained themselves as I can provide this Court with videos of guests appearing on Manopla lives stating that “this week was insane”, “thank god shabbat is coming”, “we all need a rest”.

529. Over the course of 24 hours, I was subjected to two separate protests, one occurring at my personal home in Oakhurst on March 10, 2021, at 10:00pm and one in Brooklyn, NY, at 10:00am and these Defendants played a role in aiding those riots materialize.

530. What happened to me and Dibo Hafif has probably never occurred in 21st century America; namely one individual personally and intentionally targeted with threats of physical violence, published in front of hundreds of thousands of people, encouraging mob riots at said

individual's home, all in order to intimidate said individual to engage in religiously protected action.

531. The chesed fund campaign was explicitly phrased as "free Elizabeth" with a description of me being an abuser, made in a public forum, and each Defendant caused that message to be communicated to me while in the State of New Jersey. And they each separately advised me to "Free Elizabeth" by posting that in their description of the post.

532. Not only did these Defendants republish the contents of the campaign but they explicitly and intentionally actively promoted it thereby causing me additional untold emotional distress.

533. These other Defendants encouraged and supported acts of violence by sharing and republishing the website link, knowing full well, based upon the content in the link that contained threats of physical harm to my body and property, that it would cause me additional emotional harm. Indeed, the webpage was designed to cause me such emotional distress that I would have no choice but to acquiesce and give them what they demanded; namely a Get .

534. All the Defendants should be found liable for intentional infliction of emotional distress as they intentionally engaged in actions for the express purpose of causing me such severe emotional distress that I would have no recourse but to give in to their demand to give Kairey a Get. And indeed, they succeeded as I now have a continuous need for therapy due to the emotional harm I suffered from their actions.

535. There is no countenance in a civilized society for people to harass specific individuals, intentionally and knowingly, and publicly encourage the masses to riot and harass said individuals at their private residences to engage or refrain in religious behavior. Said

conduct is intolerable in a civilized society and must be punished with extreme measures in order to prevent them from happening again.

SECOND CAUSE OF ACTION-DEFAMATION

536. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “535” herein with the same force and effect as if the same were set forth at length herein.

537. To establish a prima facie case of defamation, a plaintiff must establish the defendant (1) made a defamatory statement (2) concerning the plaintiff, (3) which was false, (4) was publicized to a third party, and (5) caused damages to plaintiff.

538. A defamatory statement is one that is (1) false and injures another person's reputation, or (2) subjects a person to hatred, contempt, or ridicule, or (3) causes others to lose good will or confidence in that person.

539. Under New Jersey law, to receive a compensatory award for reputational loss, a plaintiff will be required to prove actual harm, pecuniary or otherwise, to his reputation through the production of evidence. Additionally, Plaintiff should produce concrete proof that third parties lowered their estimation of the plaintiff and that he or she suffered emotional or pecuniary harm as a result.

540. Compensatory or actual damages, as the name implies, refers to the real losses flowing from the defamatory statement. It is not limited to out-of-pocket loss but includes impairment to reputation and standing in the community, along with personal humiliation, mental anguish, and suffering to the extent that they flow from the reputational injury.

541. Under New Jersey law, a defamatory statement, generally, is one that subjects an individual to contempt or ridicule, one that harms a person's reputation by lowering the community's estimation of him or by deterring others from wanting to associate or deal with him.

542. In New Jersey, a statement falsely attributing criminality to an individual is defamatory as a matter of law. To state a claim for slander or defamation, a plaintiff must allege that defendant communicated a false statement about plaintiff to a third person that harms plaintiff's reputation in the eyes of the community or deters third persons from associated with the plaintiff.

543. According to New Jersey law, to prove libel plaintiffs must show harm to reputation. Plaintiffs may do this by showing concrete proof that third parties lowered their estimation of the plaintiff and that he suffered emotional or pecuniary harm as a result. The more customary types of actual harm inflicted by defamatory falsehood include impairment of reputation and standing in the community, personal humiliation, and mental anguish and suffering.

544. Under New Jersey law, presumed damages apply in libel cases.

545. In New Jersey, concerning special damages, proof that an existing relationship has been seriously disrupted or testimony of third parties detailing a diminished reputation will be necessary to satisfy the requirement that special damages exist before a jury may award any other types of damages.

546. All the false statements published and printed about me by these Defendants on the internet and on the cardboard signs at the protests were in writing and therefore that falls

under libel. And the statements accusing me of abusing my wife, which were stated publicly at the protests, are slander per se.

547. Prior to law school I was a teacher in several different Yeshiva's, some of which are a part of the Syrian Jewish community. I primarily taught children with special needs such as learning disabilities and ADHD. Additionally, I used to oversee and teach SAT courses in Syrian Community schools, such as Yeshiva Shaare Torah and Yeshiva Darche Eretz, both located in Brooklyn, NY.

548. In the past, I worked as a tennis instructor for a Syrian Community Camp in Deal, NJ. Tennis is a hobby of mine as well and I was invited to the prestigious US. Open Tennis Grand Slam to participate as a hitting partner for the best tennis players in the world. Additionally, I have a YouTube channel titled EMH tennis where I have received several hundred thousand views, however, I have made absolutely zero income from said YouTube channel.

549. Annually, the Syrian Community entertains its members by organizing public tennis tournaments and it is considered a great honor to play in said tournaments. I was not invited to the tennis tournaments this past summer because of the defamation the Defendants committed against me and have not been invited to any weddings nor social events and in the past I attended Syrian Community weddings on a bi-weekly basis.

550. In the past, I had a job working for a very well-respected member of the Syrian Jewish community; namely Abe Chehebar. I have reached out to numerous individuals for employment opportunities within Syrian Community and beyond and have been rejected by each and every one with many of them citing the information that was stated about me by these

Defendants as reasons why they will not offer me positions of employment. I have been informed by many of these people that they are afraid to be seen or associated with me because of the claims made about me at the protests, webpage and on Instagram.

551. Many people who I was previously friends with have stopped communicating with me ever since I was defamed by these Defendants.

552. These former friends of mine have explicitly told me they cannot be friends with me anymore because of the information that was stated about me by these Defendants.

553. Also, because of this harassment and defamation campaign launched by the Defendants, I was ridiculed and humiliated by thousands(no exaggeration) of people on Instagram lives of Abraham Manopla.

554. I was called an abuser, among other pejorative terms, all because of the harassment and defamation campaign of these Defendants that they stated about me in a public forum. Mr. Manopla claimed I sexually and physically abused my wife and over 10,000 people were exposed to said statement, which of course is false.

555. As can be seen in the Flatbushgirl post, the Defendants attempted, successfully, to deny me employment opportunities and destroy my name in the community.

556. Numerous posts were published in public arenas that I should not be serviced in any way shape or form.

557. I was explicitly called a fake attorney/lawyer by two separate defendants here and that accused me of professional misconduct and certainly caused me to lose goodwill.

558. The Defendants have permanently damaged my future prospects of gaining employment as a lawyer as I have spoken to several attorneys who said they heard I was going around saying I was a lawyer when I was not, and that has damaged my standing in the community, something which the Defendants intended to do.

559. I have never stated to any person that I passed the bar exam.

560. I have always told anyone who asked that I was temporarily authorized to practice law pursuant to the Appellate Division 2nd Department order issued by then Presiding Justice Alan D. Scheinkman.

561. I have reached out to several attorneys for jobs and have been rejected.

562. One attorney named Saul Cohen, a member of the Syrian Community, when I asked him for a job, simply replied with information about my divorce matter instead of telling me yes or no.

563. Additionally, because of the Defendants campaign against me, Mr. Manopla, who is their spokesman on Instagram, published a video to over 10,000 people stating I am piece of shit scum bag and cursed me and my family and advised thousands of people not to patronize me in any way, shape or form.

564. On another separate live video, which was viewed by thousands of people, Mr. Manopla then, speaking directly to me, stated that I have been excommunicated from the Syrian Community and I am not allowed into any synagogues or stores to buy food. He literally went on Instagram and issued direct threats at me in front of tens of thousands of people.

565. Manopla only became involved in my personal divorce matter because of these Defendants. It is beyond outrageous that random people who have no connection to me were calling me an abuser and publicly defaming me for no apparent reason other than to harass me and destroy my name for years to come. Manopla's actions were only done because these Defendants destroyed my name and the public saw that since Rabbi Mansour and his Shul were defaming me it must be a worthy cause.

566. There is no law that says not giving a get is abuse.

567. My name is now permanently available on a google search of Elliot Hirsch as get refuser.

568. All future employers will now see this defamation about me and that is quantifiable damages that can be ascertained at trial, which is certainly over \$75,000.

569. If my name Elliot Hirsch is typed in google, the results will fill in "get refuser." This is the most devastating part of this defamation and harassment campaign; namely that I am permanently associated with being a get refuser and will have to pay exorbitant amounts of money to remove said defamatory content if that is even possible.

570. People search online as to what is a get refuser and will see it is associated with committing abuse and dastard behavior as evidenced by the hundreds of articles claiming that refusing to give a get is abuse.

571. Additionally, when typing my name on google search, a picture of Dibo Hafif will show up and all the articles about Dibo will be available. Said result permanently associates me to be of the likes as Dibo Hafif who was defamed and harassed even worse than I and who has one the worst reputations out there.

572. As this Court is aware, once defamatory statements find their way onto the internet, they do not disappear, and it is going to cost me hundreds of thousands of dollars to remove the defamation that is located online about me (there are businesses online that specifically were created to remove online defamation).

573. There are news articles posted online with my picture describing me as a Get refuser and holding my wife hostage as an Agunah.

574. These news articles were only posted because of the actions of these Defendants.

575. I reached out to a Bes Din for employment, and they rejected me citing the information that the Defendants stated about me.

576. A former friend of mine, named Ikey Chrem, messaged me “you’re going to need to move to Kentucky and start a new life. Everybody knows who you are now. This is bad man.”

577. I am able to provide this Court with concrete proof that third parties have lowered their estimation of me and that I suffered emotional harm as a result, as evidenced by some of these Defendants posts on their Instagram accounts.

578. I am constantly suffering from trauma and anxiety and relive the week of March 8-11 on a daily basis.

579. I am longer invited to peoples’ homes for meals and have been ostracized from a community where I was an active participant.

580. All the Defendants deliberately intended to subject me to hatred , contempt, and ridicule.

581. Each and every Defendant intentionally attempted, successfully, to cause others to lose confidence in me and to take away any good will I have with others.

582. The explicit purpose of the Defendants actions was to publicly humiliate me, find ways to have me arrested and have me fired from my job.

583. The Defendants all were deeply involved in a campaign to bring my divorce controversy to the public eye with the express intention to cause me intense ridicule and public humiliation.

584. I received numerous messages from random people and people that I knew advising me to permanently leave town as my name is now permanently damaged in the community and at large. I also received numerous messages from random people calling me a piece of shit and asshole because I did not give my wife a GET. I am able to furnish these messages at trial.

585. All the Defendants are guilty of accusing me of withholding a GET and calling that abuse, thereby falsely accusing me of abusing my wife.

586. The Defendants accused me of abuse and said statement of fact was intentionally stated to cause me to lose goodwill in the community and subject me to hatred and ridicule. And said statement of fact is false as I have never been convicted of any abusive behavior towards my wife.

587. According to Orthodox Jewish Law I was not withholding a GET.

588. I am not legally divorced and according to several Beth Dins, I am still unobligated and in fact, not supposed to give my wife a GET until my divorce is settled. This is

why ORA was not involved in this action; namely, because they only do so when Bes Din gives them permission.

589. I have never been convicted of a crime of abuse to my wife.

590. Because of the defamatory nature of the published statements of facts concerning me, I have suffered permanent emotional harm, including but not limited to suffering from post-traumatic stress, nightmares, anxiety, fear, depression, and insomnia.

591. I have received numerous rejections of employment opportunities solely because of the defamation the Defendants publicly stated about me.

592. Recently, I applied for jobs with several potential employers and was summarily rejected with the potential employers citing the abuse and child support delinquency claims made about me by these Defendants.

593. On the Instagram posts where the free Elizabeth chesed fund campaign was published, numerous people posted derogatory and insulting comments about me, evidencing that third parties lowered their estimation of me directly because of the defamation chesed fund free Elizabeth campaign.

594. Under Eva Shammah's post, a woman named Vicky Cohen stated: "NOBODY SHOULD BE USING THIS BOYS FATHER. HE'S A PAIN MANAGEMENT DOCTOR. NOBODY", evidencing the intent of the defamation that was deliberately phrased as such to cause people to not associate with me or my family in any way, shape or form.

595. In another post, a woman named, Grace Marcus, posted “I think a group of sy moms should beat the **** out of him.” Will all due respect the rabbis can’t do that. After hes beaten up let his father give him pain management.”

596. This comment caused me severe emotional harm because this lady is my best friend’s mother-in-law and I have actually been invited by her in the past to attend family dinners. Ever since this campaign I have not been invited over.

597. Grace Marcus lost all respect for me because of the defamation campaign, and she felt able to publicly humiliate me in front of thousands of people under the defamation chesed fund free Elizabeth post because she believed the information in the campaign.

598. Another lady named, Rachel Haddad, posted a comment stating “so sad, truth. We should all protest in front of his house. I don’t care if you have a mental disorder. U sign this paper 123 and ur finished. How dare this man do this!!!Shame on his parents they should disown him” as seen here:



599. Seeing these comments posted about me by random third parties in the community that do not even personally know me, accusing me of having a mental disorder, has caused me irreparable damage to my reputation and caused me indelible emotional harm as a result.

600. I am constantly consumed with embarrassment, anxiety, shame, fear, depression, apprehensiveness all because I became aware of how many third parties lowered their estimation of me because of this free Elizabeth campaign.

601. Prior to law school, I had a student by the name of Judah Marcus.

602. I taught Mr. Marcus math in addition to being his coach on the tennis team.

603. I used to be a high school tennis coach prior to law school.

604. I became friends of the family of Marcus and his mother happened to be senior tax counsel for CBS.

605. Judah's mother, Stephanie Marcus, is senior tax counsel at CBS.¹⁴

606. Ms. Marcus was aware that I was going through a divorce ever since my wife left me. And Ms. Marcus actually wrote me a recommendation letter for entry into law school which demonstrates our prior good relationship.

607. I considered Ms. Marcus and her son to be friends of mine and I believe they would say the same thing.

608. On March 8, 2021, at 5:40pm, Stephanie sent me a text in WhatsApp with the link to the defamation campaign published by these Defendants and stated "Hi Elliot. What are you doing? Your are ruining your name and your family's name. Give Elizabeth the Get. Arent you embarrassed? I always stood by you, and I know your story but what you are doing is terrible."

609. Then Marcus stated, "What does that have to do with anything? I'm a person with a heart. You are better than this Elliot."

610. She then stated "Elliot, you have a child you are not supporting. Innocent until proven guilty is if your accused of a crime. If the Bet Din told you to give the get then you

¹⁴ <https://www.zoominfo.com/people-search/--Senior+Tax+Counsel>

should give the get. I don't know why you're ok with not supporting your daughter and why your holding Elizabeth hostage."

611. These text messages from Ms. Marcus, a highly powerful and respected attorney, caused me irreparable emotional harm.

612. Firstly, these messages are concrete proof that my reputation was lowered in the eyes of third persons solely because of the defamation campaign as she specifically referenced the campaign and even sent me the link to the campaign.

613. Secondly, Ms. Marcus is a lawyer. If she believed the defamation then certainly the general public, who are not attorneys and do not know laws of authentication and rules of evidence, believed the defamatory information published about me.

614. Ms. Marcus explicitly stated to me " You are better than this Elliot." That is irrefutable evidence that third parties, especially ones I had a prior relationship with, lowered their estimation of me because of the chesed fund free Elizabeth campaign.

615. Ms. Marcus' texts to me, reprimanding me that I haven't paid any child support, obviously evidences her belief in the statements made about on that website campaign.

616. The entire campaign referred to me as he and it was absolutely clear that the campaign was referring to the husband of Elizabeth Kairey, and as this Court is aware, it is publicly available information when parties are divorcing and therefore there is no doubt that the campaign was speaking about me, Elliot M. Hirsch.

617. The comments section of the free Elizabeth campaign had my personal name posted by numerous people evidencing the proof that the general public knew that the defamation concerned me.

618. It is a false statement of fact that I have not paid any child support to Elizabeth Kairey as the campaign claimed.

619. I have never been found guilty of failing to pay child support in violation of a Court order and I have, in fact, paid child support to Elizabeth Kairey.

620. The Defendants falsely claimed that I never paid any child support to Elizabeth Kairey, which attributed to me the heinous crime of failing to pay child support, which under New Jersey law classifies this as defamation per se with presumed damages since this is a criminal offense which carries with it a jail sentence.

621. The Defendants falsely published to third parties that I appealed every order of the civil divorce action I am involved with Elizabeth Kairey.

622. I did not appeal every order from “civil court”, referring to my divorce action, and accusing me of doing so was intentionally trying to get the public to view me as a vexatious, recalcitrant litigant, which caused me to lose good will in the community and also damage the profession that I was in; namely the legal field.

623. The Defendants also published to third parties that I committed abuse to my wife.

624. Being that my wife has admitted to being involved with approving the content of the webpage, these Defendants acted with actual malice knowing full well that the statements of facts published about me were false.

625. All of the defamatory statements published concerning me have to do with my relationship with Ms. Kairey and Ms. Kairey has admitted to approving the content of the webpage and she has a relationship with all of these Defendants.

626. Said statements of fact are false and caused me to lose goodwill in the community and caused others to disassociate themselves from me and lose confidence in me.

627. Because of this massive intentional defamation campaign published by the Defendants my reputation has been permanently damaged, and I have suffered untold emotional harm and have lost economic opportunities.

628. The weekly therapy that I have commenced because of the chesed fund free Elizabeth campaign is to deal with, *inter alia*, the direct emotional distress that I suffer from because of the defamation.

629. A random woman, named Julia Greenstein, who is from the Syrian Jewish Community, messaged me on March 10, 2021, that I am “power hungry”. And that makes me a “sick person”, along with the link to the chesed fund campaign free Elizabeth site.

630. Julia said to me that I “can’t even do something moral” referring to giving my wife a GET thereby evidencing that the defamation caused the public to view me as an immoral person and cause people to view me with contempt.

631. I am not suing Julia for sending me harassing messages, but it is obvious that her messages are concrete proof that third parties, people that I have never met, lowered their estimation of me and that is exactly what the defamatory statements published were intended to do.

632. As I have shown, solely because of the free Elizabeth chesed fund campaign, various third parties have name called me a sick man, immoral person, and an abuser. This is exactly the definition of having my standing as a good person in the community lowered.

633. Prior to the defamation campaign, I was very friendly with a man named Albert Gindi.

634. We spoke numerous times on the phone. On or about April 11, 2021, Murray Betesh, who is responsible for a tremendous amount of harassment and defamation towards me, commenced a live on Instagram and it had about 200 viewers. On said live, were 3 other guests, Marc Abady, Jeff Sitt, and Chana Perlowitz.

635. On said live, all 4 of these people were making fun of me. They mentioned my name, Elliot Hirsch as the subject of the ridicule. One of the comments posted on the video was by Albert Gindi, my former friend, and he stated for all 200 people to see, “ your sick in the head Elliot.”

636. On April 11, 2021, Albert texted me that “I don’t think it’s a good time for me to talk to you. Prove people wrong clear your name.” He also called me asking me why I abused my wife and why I didn’t give her any money.

637. I lost former friends because of the free Elizabeth campaign launched against me. My own former friend Albert Gindi, who used to think I was a good guy, now because of this defamation campaign, he thinks I abused my wife and never gave her child support.

638. Abe Manopla and Murray Betesh entertained thousands of viewers online calling me a get refuser and an abuser.

639. These men only started their public live videos speaking about me once the chesed fund campaign was published.

640. On March 11, 2021, at 8:53am, I received a message from Shani Meshizahav, a former friend of mine, who texted me “I have to say with my recent discovery of the truth of your situation, I am truly shocked and disgusted by your convoluted version. How can you take this power and hold it over someone’s head for 5 years? Do you really think any woman is going to come near you with this(free Elizabeth campaign) circulating? Best believe I will join the cause to help free your wife and daughter and get the freedom and justice they deserve.” Go to Bet din and do the right thing.”

641. This is yet another example of a former friend who lowered their estimation of me because they believed this defamation campaign.

642. I have asked numerous businesses and individuals for employment opportunities and have been summarily rejected. I have indeed received replies citing the defamation that was published by these Defendants as reasons why the employers do not want to hire me.

643. I received a response from a prestigious Bes Din in Lakewood stating that because of the accusations hurled against me in this defamation campaign that they cannot employ me.

644. Many people in the Orthodox world knew me as a smart, good, intelligent, hardworking man before this campaign.

645. Now because of this campaign, I have suffered irreparable damage to my reputation in the community and that has caused me permanent emotional harm.

646. The general public, as I have shown, actually believed the defamation published about me.

647. My own brother said to me, “Elliot your making this family look horrible. How can you do this to us?”

648. I have several brothers who cannot get set up with Syrian Jewish girls because of the defamation stated about me.

649. My brothers also blame me for not allowing them to be able to get married to any girl from the Syrian Jewish community as the matchmakers no longer set up any of my younger brothers with marriage minded women from the Syrian community.

650. I have immense emotional suffering that these Defendants caused me by having the most beloved people in my life suffer from what occurred to me.

651. These Defendants ruined my life, and I will never get back the sterling reputation that I once had.

652. The Jewish Orthodox community in America numbers in the low 1 to 2 million and get refusal abuse is something that is ubiquitously discussed.

653. My chances at marrying an Orthodox Jewish girl are completely gone.

654. Multiple matchmakers, who have tried setting me up, have constantly received no’s when they suggest me.

655. The matchmakers advise me that the get refusal campaign published by these Defendants, which has cemented my name as a former “get refuser”, is going to be near impossible to be overlooked when a potential match comes up for me.

656. Orthodox Judaism engages in matchmaking with professional matchmakers, which is indeed how I met my wife. And whenever a match is suggested, it is reasonable to assume that the persons' name is searched on google and "Elliot Hirsch get refuser" is the first thing to come up.

657. Not being able to get married to an Orthodox Jewish woman is a life sentence of mental and emotional anguish for me because I am an Orthodox Jew.

658. I do not know how I am going to be able to recover from this defamation campaign published against me as I am now needing constant weekly therapy and medication to deal with the multiple symptoms I now suffer from because of these Defendants.

659. Another former close friend of mine named Yitzy, has stopped inviting me over for Sabbath meals because his wife refuses to allow me into the house because of the chesed fund campaign.

660. Abe Manopla, the Mexican pacino, was actually a close friend of mine for many years before this whole defamation campaign started.

661. Manopla felt absolutely horrific for me when this campaign came out.

662. He said, "what are you going to do elliot? The whole community is bashing you."

663. Then, Manopla turned on me, and after joining forcing with the powerful Rabbi Eli Mansour, Manopla starting working with others in order to protest me and send people to my house to harass me into giving my wife a Get.

664. Manopla would go on live videos speaking about my personal life in front of his thousands of followers.

665. It is true, that Manopla, throughout the whole ordeal, expressed some positive feelings towards me on his lives.

666. When Manopla publicly expressed that he still considers me a friend, the guests on his live lambasted him.

667. For example, Michael Salomon, a man who was field reporting outside the riot at my home on March 10, 2021, told Manopla I don't think you should be friends with Elliot.

668. Salomon and the rest of the guests appearing on the show, told Manopla that I am not the person he should be associating with because I am an abuser. After extracting a Get from me, Manopla himself advised the public on video he posted with Saul Harari that he was leaving this mob movement because it was too much and got out of control.

669. It is one thing for a private individual to defame someone, but when a prestigious religious organization, such as the Edmond J. Safra Synagogue, publishes statements of facts about you, it's considered as truthful as if god himself said those words.

670. Isaac Cohen posted numerous comments on Instagram stating, "elliot, pay child support", in addition to berating me that I don't support my child in front of 20 or so other men.

671. I actually do support my child with food that I receive from New Jersey Snap food stamps which can be corroborated by the New Jersey Snap Program.

672. From what I have seen, this State has not seen a defamation case where one was falsely accused of never paying any child support but then again, I doubt there exist a case like this in all of the United States Court houses, Federal and State alike.

673. As this Court has in the past relied on case law from other jurisdictions, specifically, New York, I would raise the case of *Grieco v. Galasso*, 297 A.D.2d 659 (2002), which an identical false accusation was made against the Plaintiff in that case, where he was defamed by a statement stating, “refuses to pay child support.” There, the court concluded that said statement was defamatory and met all the elements of defamation and awarded damages.

674. However, this case is substantially more damaging than that of *Grieco* because these Defendants published these statements on the internet, where it is obvious that the reach of said publication is worldwide and caused me much more reputational damage than in *Greico*.

675. Accordingly, all the Defendants who separately and independently published said defamatory statements of facts about me and which caused me lost economic opportunities and permanent emotional harm, are guilty of defamation.

676. My temporary license that authorizes me to practice law, which was signed by Presiding Justice Alan D. Scheinkman of the Supreme Court of New York Appellate Division 2nd Dep. has expired.

677. Although I have not made any money in my position as a temporarily lawyer I was able to advertise(without cost) and promote myself to provide legal services and my name spread around and I did receive several phone calls with people seeking counsel.

678. It is well established that employers research prospective employees, including but not limited to, searching up the prospective employees’ name on google and various forms of social media. And said search will reveal much defamation about me including but not limited to me having committed abuse to my wife.

679. Because of the actions of the Defendants during March 2021, which was the time I was planning on dedicating to signing up for the Bar Examination and concluding my studies, I was effectively precluded from doing so by suffering the intense emotional distress I was

680. These Defendants have cost me untold financial and emotional loss and must be held accountable for intentionally defaming me in order to cause the public to view me with contempt and lose goodwill in the community.

681. All the Defendants that separately and independently published the link to the chesed fund campaign are guilty of defamation. In addition, those Defendants that separately and independently accused me of abuse are guilty of defamation.

682. I have not appealed every decision of the Supreme Court, as the webpage campaign stated about me and said statement accused me of doing so and was meant to cause the public to view me as a vexatious litigant, which is a term that caused me to lose good will in the public eye and further hurt my reputation.

683. A defamatory statement is one that tends to harm the reputation of the plaintiff or to lower plaintiff in the estimation of the community or deter third persons from associating or dealing with him or her.

684. All over the internet the posts about “GET refusers” state that the public should stop associating and dealing with said refusers and accuse get refusers of abusive behavior. Additionally, these internet magazines articles confirm the exact claim that I am accusing these defendants committing; namely “public humiliation” of me and my family.¹⁵¹⁶

¹⁵ <https://www.theguardian.com/world/2021/jun/04/jewish-orthodox-women-divorce-get-refusal>

¹⁶ <https://www.thejc.com/comment/opinion/here-s-my-plan-to-free-women-from-get-abuse-1.512351>

685. The Defendants knew that by stating I was withholding a GET they would be causing people to stop associating with me.

686. It is important to note that not one Rabbinic Court permitted the Defendants to do any of the actions they did.

687. A plethora amount of news media sites reported on the protests. Heshy Tischler, Amber Adler and Adina Miles gained nationwide attention for their involvement in protesting me and others.¹⁷

688. The Guardian and Vogue, both widely popular national news magazines, both published news articles on their sites reporting on my protest and others as well and this so called Agunah movement. What these media sites aren't aware of is that the people in charge of these campaigns are engaging in criminal acts of harassment and intimidation in order to violate the men's freedom of religion.

689. Several Jewish news media sites published the stories of the protests and in fact on one website there is a picture of me and my wife with a title that claims my wife was an Agunah. My wife is not an Agunah and said term causes me much permanent humiliation and causes me to lose good will in the eyes of the public.¹⁸

690. I never requested to be published on any news media sites with a picture of me and my wife and the site stating that my wife was an Agunah. Now, my reputation is permanently damaged.

¹⁷ See <https://www.theguardian.com/world/2021/jun/04/jewish-orthodox-women-divorce-get-refusal> and see <https://www.vogue.com/article/agunah-get-refusal-social-media-campaign-orthodox-women>.

¹⁸ <https://vinnews.com/2021/03/11/elizabeth-is-free-flatbush-agunah-receives-get-as-momentum-builds-to-support-trapped-women/>

691. I simply asked the people involved with doing the GET that a video be posted on Instagram advising the mob rioters not to come to my home because I gave my wife a GET.

692. Norma Tawil accused me of being a fake attorney. Said statement of fact was false and caused me much public humiliation and loss of good will as many people now think I was not a lawyer and was not allowed to practice law, when in fact, at the time of said statement I was authorized to practice law.

693. Nourite Maimon publicly stated a false statement of fact claiming that I am not a lawyer. When Nourite Maimon made this statement I was “temporarily authorized to engage in the practice of law” by order of the Supreme Court of New York Appellate Division 2nd Department.

694. According to <https://en.wikipedia.org/wiki/Lawyer>, a lawyer is a person who practices law.

695. According to the order of the Supreme Court of New York Appellate Division 2nd Department I was authorized to engage in the practice of law, albeit temporarily.

696. Accordingly, Nourite Maimon is guilty of defamation per se by accusing me of falsely stating to people that I was a lawyer in addition to her false statement of fact claiming that I was not a lawyer.

697. All the Defendants accused me of abuse and not “Freeing” my wife Elizabeth. The Defendants accused me of the crimes of false imprisonment, abuse, and kidnapping, all three of which are false statements of fact about me.

698. Non-Jews are not familiar with the GET laws and Orthodox Judaism.

699. A search of Elizabeth Kairey online will show my wife's picture and the hashtag free Elizabeth.

700. The general populace does not understand that when the Defendants stated to me to "free Elizabeth" they were demanding I give my wife a Get. Instead, the populace will reasonably conclude that Elizabeth's husband, me, has committed the crimes of false imprisonment and/or kidnapping.

701. I have never been convicted of any crime, let alone any crimes against my wife.

702. I also have never been arrested for, allegedly, committing any crimes.

703. These Defendants have specifically injured me in the trade that I am in, namely the legal profession.

704. It is indisputable that at the time their statements were made I was authorized to practice law, which made me, technically, a lawyer.

705. The Defendants statements reached hundreds of thousands of people and because of their campaign against me there is permanent indelible damage to my reputation on the internet concerning my name.

706. There is much future harm besides for the current harm, that I am going to be subjected to all because of the Defendants campaign against me; namely being that all future employers will search my name on google before hiring me(something that is common for employers to do prior to hiring individuals).

707. Ever since this campaign was launched I have not received any potential clients for work and have had zero employment opportunities. Additionally, there were several potential

clients I could have been hired by at this point but once the campaign was launched they stopped communicating with me.

708. All of these Defendants publicly, in front of tens of thousands of people, accused me of being a bad, evil, and abusive person.

709. It is also undisputed that during my work years, I was predominantly employed by the Syrian Jewish community. Accordingly, I have practically never worked for any company outside the Syrian Community and now my reputation in said community is permanently tarnished.

710. Because of the campaign against me, I have lost all future employment opportunities in said community. As I have been completely ignored by numerous members of this community when I have reached out to them for employment.

711. Because of the Defendants actions I now need additional therapy and medication to deal with the emotional distress they have caused me.

712. My current psychologist has advised me to seek out a psychiatrist for medication and indeed I have found and starting seeing a neurologist to deal with my exacerbated medical condition.

713. It is natural and direct result of the Defendants campaign against me that I have stopped receiving phone calls from potential clients for legal work and for any business opportunities.

714. Hundreds of thousands of people were exposed to this campaign against me.

715. The publication of pictures of me with descriptions advising the audience to disassociate themselves from me and not service me in any way is concrete evidence that third parties how lowered their estimation of me directly because of the actions of the Defendants.

716. I have been exposed to hatred, harassment, threats of physical violence, mob protests outside my home, and contempt solely because of the actions of these Defendants.

717. I have been advised that it will cost me hundreds of thousands of dollars to remove the defamatory and harassing statements made about me on the internet. Moreover, there exist companies that deal directly with this issue; namely, removing defamation online which irrefutably proves that it is going to cost me thousands of dollars to remove the defamation about me on the internet.¹⁹

718. Dibo Hafif is written up all over the internet as an abuser who committed egregious despicable behavior towards his wife.

719. My name is permanently associated now with Dibo Hafif.

720. There are thousands of companies online that charge exorbitant amount of fees to remove online defamation.

721. My wife, Elizabeth Kairey, who is searchable online as my wife since our divorce controversy is public information, created a hashtag called “free Elizabeth”.

¹⁹ https://defamationdefenders.com/content-removal/internet-defamation/?utm_term=how%20to%20deal%20with%20slander%20on%20social%20media&utm_campaign=DD+Reputation+Search-10+-+Maximize+Clicks&utm_source=adwords&utm_medium=ppc&hsa_acc=8453879358&hsa_cam=1685456526&hsa_grp=68325113442&hsa_ad=375007982861&hsa_src=g&hsa_tgt=kwd-646380833443&hsa_kw=how%20to%20deal%20with%20slander%20on%20social%20media&hsa_mt=b&hsa_net=adwords&hsa_ver=3&gclid=Cj0KCQjwjo2JBhCRARIsAFG667V9M_nIBgP5BnS2hx09ImXbz3A8QAw6Kad13otznqvx9HQLDu7bjElAajFCEALw_wcB

722. Said term permanently associates me with having committed the crime of either kidnapping Elizabeth or having her as my slave. It is going to cost me hundreds of thousands of dollars to remove the hashtag free Elizabeth from the internet if that is even possible. The numerous posts by various third parties regarding me being a “get refuser” is irrefutable evidence that in the eyes of third parties my reputation was damaged.

723. Because of the Defendants, I was subjected to immense trauma that left me unable to complete my studies for the bar exam and I lost future income as a barred attorney since my temporary license has expired.

724. It is highly common among defamation plaintiff’s to be consumed with trauma relating to the defamatory content and such has occurred to me.

725. I have extreme hardship studying and suffer immense emotional distress because of the permanent defamation on the internet about me.

726. The reason it was nearly impossible for me to receive clients while working as a temporary lawyer for David Scop is because Mr. Scop required my clients to pay additional fees for him to review the work I would be doing since he was required by order of the Appellate Division to sign off on all documents I prepared. This placed me in the difficult position of having clients pay extra fees to hire me.

727. All of the potential clients I spoke with, including, Mr. Abraham Feff of Brooklyn, New York, advised me they prefer to wait until I am barred so that they do not need to pay the additional fees to have a supervisor review work.

728. Because of these Defendants I am not yet barred, and I have loss of income as an admitted attorney with minimum \$60,000 yearly salary but now at the minimum I won’t be a

lawyer till next year 2022 and likely further as I presumably will not be ready for the upcoming February bar exam. I am going to try to conclude my studies for said exam, but it will be difficult given my constant need for therapy and trauma, depression, anxiety, that I now suffer from because of the defamation and harassment the Defendants subjected me too.

729. Thousands of people on Instagram commented about me stating I am an abuser and an evil person.

730. Most, if not all, of the defamatory comments posted about me fall under defamation per se.

731. A typical job, with someone with my legal background and work experience(I used to be a teacher and I graduated the University of Seton Hall School of Law in 2019 with a Juris doctorate), pays at least \$60,000-\$80,000 annually.

732. All the Defendants besides Mansour and Kairey are guilt of Defamation.

THIRD CAUSE OF ACTION-FALSE LIGHT

733. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “732” herein with the same force and effect as if the same were set forth at length herein.

734. To state a claim of false light under New Jersey law, a plaintiff must allege that (1) “the false light in which [she] was placed would be highly offensive to a reasonable person” and (2) “the defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the [plaintiff] would be placed.”

735. The previous paragraphs certainly allege that the Defendants have acted with knowledge or acted in reckless disregard for the veracity of the claims they hurled at me such as name calling me as an abuser, evil person, not setting my wife free, being a fake lawyer, not paying child support, and appealing each and every decision that was issued in my personal divorce matter.

736. Additionally, I have shown in the previous paragraphs I have lost specific economic opportunities because of the defamation of the Defendants that have actually put in place stumbling blocks that I am continuously facing finding employment because of their prior actions. Moreover, being able to get married is also considered an economic benefit and now I am precluded from being able to marry an Orthodox Jewish woman because of these Defendants.

737. All the Defendants publicly stated that I was not giving my wife a Get and that I was a Get refuser and accused me of committing abuse, which is obviously highly offensive to a reasonable person.

738. Due to the numerous amounts of news media sites online classifying a Get refuser as a person who commits, *inter alia*, abusive behavior, the Defendants placed me in a false light in front of the public.

739. I am not a Get refuser but regardless, if that was true, the term connotes abuse and I have never been found guilty of any abuse crimes.

740. According to Orthodox Jewish law, I was not obligated to give a GET and therefore cannot be classified as one who is GET refuser.

741. These Defendants accused me of appealing all orders in my divorce action and since they were working closely with Elizabeth Kairey they were fully aware that what they placed on the webpage was false information.

742. Additionally, divorce matters are sealed in New York per Domestic Relations Law of New York and the public is not able to access any of the moving papers in said actions. Accordingly, these Defendants publicized a matter that is inherently something to which they would know is true or not since they were in direct contact with Kairey.

743. It is highly offensive to a reasonable person that his litigation efforts, which are not available to the public since they are sealed per law, are referred to in a negative manner in front of hundreds of thousands of people.

744. It is highly offensive to a reasonable person to be called an abuser and accused of committing abuse, especially to a woman.

745. It is highly offensive to a reasonable person to be accused of never paying child support as this is something that people can go to jail for.

746. It is highly offensive to a reasonable person to be accused of holding a person hostage.

747. Said accusation accuses one with criminal activity; namely kidnapping and/or false imprisonment.

748. All the Defendants are guilty of false light besides for Kairey and Mansour.

FOURTH CAUSE OF ACTION-CIVIL CONSPIRACY

749. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “748” herein with the same force and effect as if the same were set forth at length herein.

750. In New Jersey, a civil conspiracy Stat law tort is a combination of two or more persons acting in concert to commit an unlawful act, or to commit a lawful act by unlawful means, the principal element of which is an agreement between the parties to inflict a wrong against or injury upon another, and an overt act that results in damage.

751. It is enough for liability if you understand the general objectives of the scheme, accept them, and agree, either explicitly or implicitly, to do your part to further them.

752. The principal elements of a civil conspiracy are the parties’ agreement to inflict a wrong against or injury upon another, and an overt act that results in damage. Plaintiffs are not required to provide direct evidence of the agreement between the conspirators and may prove the existence of such an agreement through circumstantial evidence.

753. I have suffered injuries in the form of specific lost economic opportunities and permanent emotional harm because of the defamation/intimidation campaign launched against me as described in the preceding paragraphs of this complaint.

754. Several overt acts took place; A) a public defamation in public forums at in live protests, the chesed fund webpage free Elizabeth campaign and the Defendants personal social media platforms where they published videos of the protests falsely accusing me of being an abuser B) a riot outside my house which was organized for the purpose of extortion C) a protest organized near my father’s office, which was organized for the purpose of extortion D) hundreds

of threatening messages and calls to my cell phone harassing me and threatening me with violence in order to cause me severe emotional distress in furtherance of the planned extortion.

755. The Defendants publicly and openly gathered together at live-in-person protests working in concert in order to cause me such intense and severe emotional distress that I would have no choice but to give them what they were demanding of me; namely, a Get.

756. These Defendants openly expressed their conspiracy by using terms such as “we will not stop”, “we will bring the mob to your home”, and referencing each other and openly expressing their knowledge of the free Elizabeth defamation campaign(which asked for its readers to spread the website content in furtherance of its extortionary objective) and encouraging others to join the cause in furtherance of the chesed fund mission’s ultimate objective; namely, extortion.

757. Adina Miles is even quoted by the Vogue Magazine confirming that she expressly stated that she and her comrades would not back down until I gave my wife a Get. Her statements and the rest of statements made by these Defendants will be admissible at trial as non-hearsay opposing party statements.

758. Each Defendant expressly stated that their objective was to pressure me into giving my wife a Get, another way of blatantly stating they were attempting to cause me such severe and intense emotional distress so that they could accomplish their mission of committing extortion.

759. The riots that occurred both in New Jersey and New York have caused me permanent trauma, emotional distress, anxiety, depression, inability to function as a regular member of society and incessant nightmares and insomnia.

760. All the Defendants played an active role in the free Elizabeth campaign as described in the facts portion of this complaint. To reiterate the facts section here would be inappropriate but as described prior each Defendant played their part by actively sharing and promoting the free Elizabeth campaign and taking part in the actual extortion process of me giving Kairey a Get.

761. Kairey also gave her approval for the Defendants to engage in their actions because the agunah movement leaders do not engage in their pressure tactics unless the wife asks for their help. There are hundreds of Orthodox Jewish women who have requested Get's from their husbands but were not publicized because these wives chose not to participate in these types of actions. Accordingly, Kairey should have known that her participation would subject her to liability under the tort of civil conspiracy.

762. Kairey has already admitted participation in this campaign by approving and giving the publisher the go-ahead to publish it. By definition, this means she played an active role in its objective and understood its mission, agreed to the mission, was in direct communications with these Defendants and played her part in the role of giving her permission to publish the content that she provided the publisher with. She is a co-conspirator.

763. Eva Shammah personally texted me during the week of March 8, 2021, that Rabbi Eli Mansour told her to publicize the chesed fund campaign and that he supports the protests against me.

764. She explicitly told me that if Rabbi Mansour said not to post it on her Instagram she would not have.

765. Eva Shammah who was someone I used to be friendly with, explicitly told me that once the campaign came out, she donated to it and reposted it so others can donate. She said your wife needs money, which evidences her belief in the defamation of me.

766. These conspirators were well aware of the contents on the website as it was a public website that was available for all to see, including myself, which as described prior contained much threatening comments directed at me and the entire website campaign was launched for two purposes; namely, collect money for my wife and cause me such intense and severe emotional distress that I would have no choice but to give in to the extortionary threats.

767. No Defendant here is able to claim that they were not aware of the purpose of the chesed fund campaign since they themselves each published its content and additionally added their own descriptions on their own Instagram accounts asking the public to engage in the exact same behavior the website called for. Each and every person who spread the contents of the defamation are guilty of being co-conspirators, for agreeing to the underlying purpose of the publishing of this free Elizabeth website, and obviously an implicit agreement between all these Defendants to spread the content of the free Elizabeth webpage for the purpose of extorting me under fear of violence and reputational damage to give Kairey a Get, which resulted in me having lost economic opportunities and permanent emotional harm that requires constant need of therapy.

768. On March 11, 2021, approximately 930pm, after the Defendants extorted me, Elizabeth Kairey and Rabbi Eli J. Mansour both appeared as guests on a Manopla live video which he titled "Elizabeth Kairey."

769. Based upon said live video, with Kairey and Mansour appearing as Guests and explicitly thanking each other and all celebrating together with many of the other Defendants at the Kairey home, that evidences their conspiracy in working together to cause me harm.

770. Additionally, both Kairey and Mansour mentioned the words “we” and explicitly told Manopla, that there is more work to be done for the other “agunot”, who do not have their Get yet.

771. Based upon this circumstantial evidence, a reasonable juror is likely to conclude that this was a bona fide conspiracy between the Defendants to cause me untold harm for the purposes of extortion.

772. There is a rule in evidence where a party can adopt admissions when someone accuses them of something, and they do not deny the accusation. Manopla told Mansour that this whole thing started when he put his name behind the chesed fund campaign. Mansour nodded his head and told Manopla “Chazak Ubaruch”, a Hebrew term, meaning I admit to what you just stated, and I thank you for the approbation.²⁰

773. Mansour then said to Manopla that “we are not done Abraham.”

774. Mansour told Manopla “let me tell you what god wants from us. He wants us to help the oppressed.” Mansour told Manopla he has a whole list of other men he is going after and “we will knock them down like bowling pins.” Mansour also stated that he and Manopla are “partners”.

²⁰ <https://jel.jewish-languages.org/words/1697>

775. In totality, based upon the evidence that I retain supporting all of my factual allegations set forth before this Court, I believe a reasonable juror will certainly conclude that a conspiracy existed between all of these Defendants as they all played an active role in the free Elizabeth campaign with each person/entity having their own function in this conspiracy.

**FIFTH CAUSE OF ACTION-NEGLIGENT INFLICTION OF EMOTIONAL
DISTRESS**

776. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “775” herein with the same force and effect as if the same were set forth at length herein.

777. Under New Jersey law, to establish a direct claim of negligent infliction of emotional distress, a plaintiff must establish (a) defendant owed a duty of reasonable care to plaintiff; (b) defendant breached that duty; (c) plaintiff suffered severe emotional distress; and (d) defendant's breach of duty was the proximate cause of the injury.

778. Whether the defendant has a duty of care to the plaintiff depends on whether it was foreseeable that the plaintiff would be seriously, mentally distressed.

779. Liability should depend on the defendant's foreseeing fright or shock severe enough to cause substantial injury in a person normally constituted.

780. The severity of the emotional distress raises both questions of law and fact. Thus, the judge decides whether as a matter of law such emotional distress can be found, and the jury decides whether it has in fact been proved.

781. Elizabeth Kairey and Rabbi Eli Mansour are guilty of NIED for continuously apprising the Defendants whether or not I had given Kairey a Get thereby giving the Defendants the go-ahead to engage in their psychological warfare against me. They both should have foreseen that their participation would cause me untold emotional harm as they both knew what the other Defendants in this case were doing.

782. The Defendants are guilty of NIED for publicly accusing me of abusing Kairey and transmitting via interstate commerce means threats of violence to my body and property, which were proximate causes of my injuries.

783. Kairey and Mansour were in positions of authority and power who were proximate causes of the harm I suffered described in the preceding paragraphs of this complaint.

784. I have irrefutable evidence that Kairey and Mansour were apprised that I was being threatened with violence and intimidation for the explicit purpose of giving Kairey a Get and that their participation in the Free Elizabeth chesed fund campaign was the reason why I was being threatened and, nevertheless, they continued to play an active role in the Free Elizabeth campaign.

785. As alleged in prior portions of this complaint, Kairey and Mansour both were apprised that they were in a position to mitigate the harm that I was suffering from and refused to do so.

786. After being apprised that their actions were causing me harm, Kairey and Mansour stood by idling and allowed the harm to foment until it developed into such harm that I will now suffer from permanent emotional distress.

787. Mansour and his Temple have committed an extreme example of abuse of authority by using their positions in society to terrorize me and my family for the purposes of causing me severe and intense emotional distress in furtherance of their objective of extortion.

788. The Defendants Kairey and Mansour were proximate causes of my permanent emotional distress that I will now need ongoing therapy and are guilty of NIED.

SIXTH CAUSE OF ACTION – PRIVATE NUISANCE

789. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered “1” through “806” herein with the same force and effect as if the same were set forth at length herein.

790. In New Jersey, a cause of action for private nuisance derives from the defendant's unreasonable interference with the use and enjoyment of the plaintiff's property.

791. When analyzing nuisance claims, courts are guided by the principles set forth in the Restatement (Second) of Torts. Two Restatement sections, sections 822 and 824 of the Restatement. Restatement section 822 identifies the elements of a cause of action for private nuisance: One is subject to liability for a private nuisance if, but only if, his conduct is a legal cause of an invasion of another's interest in the private use and enjoyment of land, and the invasion is either (a) intentional and unreasonable, or (b) unintentional and otherwise actionable under the rules controlling liability for negligent or reckless conduct, or for abnormally dangerous conditions or activities.

792. All the Defendants are guilty of private nuisance for intentionally playing an active role in the free Elizabeth campaign which culminated in illegal mob intimidation riots and protests at my personal residence.

793. During the Manopla live video, in the comments section, Laurie and Norma were posting comments urging the hundreds of people viewing the live to go riot at my home because Elizabeth Kairey was advising Laurie that I hadn't given Elizabeth a Get.

794. Manopla can be seen on the video reading the comments and advising people **NOT** to go to my home(he later made a separate video urging people to go riot at my house only after he saw people were already there).

795. Laurie Beda and Norma Tawil explicitly sent rioters to my home to threaten and intimidate me into giving my wife a Get.

796. The police report attached below confirms that people were honking their horns and screaming at me to give my wife a Get.

797. I had no choice but to flee to the police station for my safety due to the explicit threats of violence I received at the behest of Laurie Beda.

798. The police offered me a safe house to sleep in that night(which I am sure is not standard protocol unless the Police feel the person's life is in danger), but I chose to go to a different location because I was in fear that I would not be safe even in police custody.

799. Since Dibo Hafif was arrested in New York by the NYPD, I was afraid something similar would occur to me in New Jersey because these Syrian Jews have so much money and I was afraid the Ocean Police Department could be bribed or corrupted like the NYPD.

800. The Syrian Jewish Community is extremely affluent, and Shomrim Police Watch group works directly hand in hand with the NYPD. On or about March 1, 2021, one of the Shomrim members came to my parents' house in NY looking to kidnap me and take me to a

Rabbi to give my wife a Get. And his actions have compelled me to bring a separate lawsuit against him in New York Supreme Court.

801. I filed two separate police reports against this Shomrim Member named Michael Wahba and I have not received an order of protection against him, and the NYPD has done absolutely nothing in the follow up to those charges, further evincing their apparent close-knit relationship with Shomrim.

802. As the Court can now understand, I had no safety net and was forced to flee my home because of Laurie Beda and the rest of these Defendants.

803. Laurie and her cohorts intentionally sent these rioters to my house to intimidate me into giving my wife a Get, as she **explicitly stated** on a video at the protest in New York the following day by saying “only because of this pressure” was I willing to give my wife a Get.

804. As the Court is aware from the previous portions of this complaint, Dibo Hafif and I were targeted by these well-organized criminal associations in order to force us to give our wives a Get.

805. The NYPD did absolutely nothing to protect Dibo, myself, and a man named Joseph Michon, who advised me he is willing to testify in this matter.

806. The NYPD did not protect Dibo and I the way the Spring Valley Police Dep. and the New York State police protected Rabbi Gestetner at the April riot outside Gestetner’s house seen here:



807. These demented people protested Rabbi Gestetner because this Rabbi issued a public letter declaring the “Syrian Mob Gittin” all invalid due to public shaming, egg throwing and coercion.

808. I never even spoke to this Rabbi and he simply issued his letter because what happened to me, Dibo Hafif and Jonathan Abtan was public knowledge and available for all to witness.

809. The Court should take notice that it was only Rabbi Gestetner who was willing to publicly state the truth of Orthodox Jewish Law, that indeed, the Get’s given by me, Hafif and Abtan were all void and null.

810. Now that this Court is aware what happened to Rabbi Gestetner as a result of his public stance on this issue the Court should understand just how fearful others were to issue any statements regarding these invalid divorces for fear of harassment, death threats, and protests outside their homes and the homes of their family members.

811. Gittin is the plural word for Get in Hebrew.

812. Why didn't the NYPD do its job like the Spring Valley Police Dep, who apparently called in the New York State Troopers?

813. These questions will have to be answered by these Defendants.

814. Also, important to note is that Michael Wahba is a prestigious member of the Shomrim Watch group and he is a board member of the Edmond J. Safra Synagogue.

815. As seen here in the below pictures, this is what the mob did to these men's homes:



38 likes

berniesetton @mexicanpacino0528 2136 E 5th. This keeps going ever night till he gives the GET #FREEEVET

jacobmarcoshamui1 Well now he's in jail



March 11



get_busters



113 likes

get_busters Late last night the Mochon house was egged. This is NOT OK. This is NOT who we are. There is a way to go about this and we as a community have to be in unison. Protesting works, we saw that. Let's stick to the game plan.

816. Michon's house was egged in the days soon after I gave Elizabeth a Get evincing what would have occurred to me if I didn't give Elizabeth a Get on March 11, 2021.

817. Because of Rabbi Mansour's involvement and support of the free Elizabeth campaign the other Defendants engaged in the incitement and broadening of the free Elizabeth Chesed Fund mission.

818. As mentioned prior, Kairey and Mansour were apprised that their actions were causing me to receive much threatening communications and that their actions were provoking mob riots and illegal protests.

819. They both intentionally remained idle and continued to participate as to their functions in the free Elizabeth conspiracy. As to these two Defendants, if their actions are not categorized as intentional, they certainly qualify as negligent and/or reckless.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Pro Se Elliot M. Hirsch requests that the Court enter an Order, adjudge, and decree in favor of Plaintiff for:

A. An award of Compensatory damages to the Plaintiff in an amount to be determined at trial but not less than \$500,000,000 with the Court adjudicating the amount to be attributed to each Defendant;

B. A permanent injunction enjoining the Defendants from speaking about the Plaintiff in any public forum including but not limited to all forms of social media;

C. A permanent injunction preventing the Defendants from contacting me in any form whatsoever, including a no-third party contact provision and preventing the Defendants from engaging in any form of harassment against me or my family members;

D. A permanent injunction enjoining the Defendants to remove all Defamatory comments that are still posted up on their social media platforms;

E. An award of treble as well as punitive damages due to Defendants' actions as willful, wanton, and malicious in any amount to be determined at trial;

F. Giving a directive to the FBI and/or U.S Justice Dep. to investigate and prosecute the Defendants for violations of Federal United States Criminal Law, if the Court determines that they violated the criminal laws.

G. An award of such other and further relief as the Court may deem just and proper.

PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11. I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case..

Dated: February 17, 2022

A handwritten signature in black ink, appearing to read "E. Hirsch", written over a horizontal line.

Elliot M. Hirsch

917 750 0418

Address: 7 Saxony Drive, Oakhurst, NJ 07755

County of Monmouth

EXHIBIT A

ELIZABETH IS FREE! Flatbush Agunah Receives Get As Momentum Builds To Support Trapped Women

March 11, 2021 11:47 pm



By Shmiel Soiferman

Who says social media is bad?

Social media and the rallies that social media have brought about – have accomplished the near impossible – pressuring recalcitrant husbands into giving a get.

The case in point, Elizabeth K., a woman living in Brooklyn, who has been waiting four years to receive her get, got it earlier tonight. Instagram was particularly effective in this get – because there is a newly empowered group of Influencers on Instagram that arranged an impromptu rally.

The rally was held this morning at one venue and went to another.

“People came out of the woodworks,” remarked Avi David, who observed the rally. “The rally was actually planned, but many other women showed up because it went viral on Instagram and everyone’s Facebook page,” he continued.

TODAY AT THE #FREEELIZABETH RALLY ON OCEAN AVENUE I SPOKE HOW WE MUST HELP THESE WOMEN & HOW WE CAN LEVEL UP OUR LEGAL/LEGISLATIVE APPROACH IN A MANNER THAT DOESN'T CONFLICT WITH OUR RELIGIOUS BELIEFS. THERE ARE REAL OPTIONS AND I WILL DISCUSS THEM MORE IN DETAIL ON SOCIAL SOON.
PIC.TWITTER.COM/J95MKYCGYL

— AMBER ADLER (@AMBERADLERNYC) MARCH 11, 2021

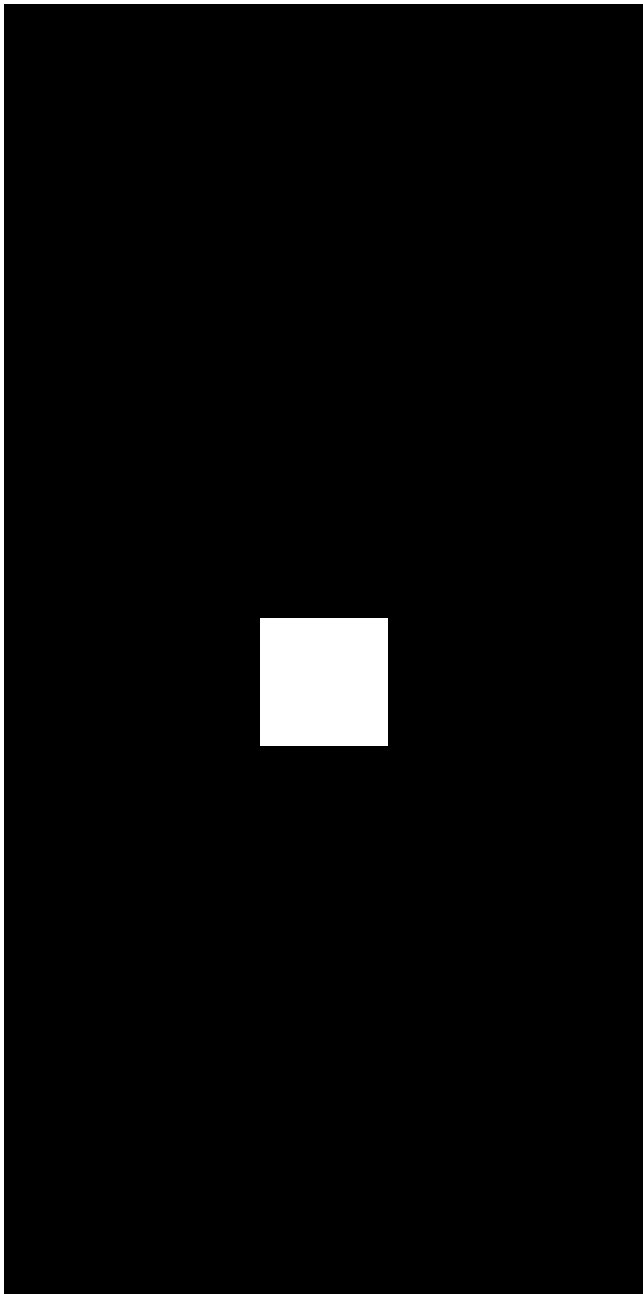
<https://twitter.com/brachashap/status/1370185847287463942>

There is evidence as well that the rally proved effective. Rabbi David Ozeri, one of the leading Rabbonim in the Syrian community appeared at the event and asked the women to stop the rally, explaining that in fact he will be meeting with the husband at 3 PM to try to obtain a Get. The women asked him what their recourse will be if the Get is not given. Rabbi Ozeri answered that in that in case he will come back the following day and lead the protest.

Sure enough, a Kosher Get was facilitated several hours later by rabbi Ozeri at the home of of Mr. Harry Adjmi, one of the pillars of the Sephardic community in Flatbush.

PIC.TWITTER.COM/TP5RPAFCML

— BRACHA KAHANE (@BRACHASHAP) MARCH 11, 2021



00:00

00:12

There is growing social media pressure on other cases as well: Yechiel Friedman is a case in point. Yechiel Friedman has been legally divorced for close to eighteen years. The actual Seruv was only issued in 2013 – by the Beis Din of America. David Nahmmany has an active social campaign going on now and is listed on Ora, a leading advocacy organization dedicated to relieving the plight of Agunos. There are two more cases that are found on Ora’s website, www.Getora.org that deserve greater recognition.

- David Nachmani and his wife have had a legal divorce since 2007. There is a siruv against him from Beis Din of America. His wife has been an Agunah for 13 and ½ years.
- Moshe Stern has been separated from his wife Patricia since 1995 – that’s 26 years. Patricia lives in Israel. Moshe Stern moves around all over the place. His last known location, however, was in Boro Park. The Psak against Moshe Stern was from the Rabbanut of Eretz Yisroel, signed by Rabbi Ezra Batzri and Rabbi Benyamin Levy and Rabbi Masoud El-Chadad.

The following links contain the biographical details of these three – with the link to the seruv.

<https://www.getora.org/yechiel-friedman>

<https://www.getora.org/david-nahmmany>

<https://www.getora.org/moshe-stern>

"These rallies worked. There are organizations and Rabbis that have worked for years and the Get has not come through. This Get came about by frum women on Instagram who have created a movement that has inspired the women you are seeing at these rallies," says Yechiel Y.

This person is clearly referring to Ora.

Others, however, have the opposite complaint. They complain about Ora's tactics saying that they violate halacha. A comment on a rival website expresses this very thought.

Ora, however, follows the advice of leading and nationally recognized Poskim.

"There is a debate among the Poskim regarding the parameters of what defines an improper get me'usa. Ora only publicizes the seruvim issued by the Beis Din and with their authorization to publicize it," explains Rabbi Yonatan Klayman, Director of Advocacy for Ora.

"It also makes a big difference if we are contacted early on. Ora works closely with the Batei Dinim, the Agunah and their legal representatives to make sure that everyone is on board with the process. The Beis

Din generally authorizes publicizing a seruv when, in their view, it would be impossible to obtain otherwise. That's why pressure implanted thoughtfully," remarks Keshet Star, CEO of Ora.

There is, of course, a downside sometimes to social media campaigns in that it can also backfire. How so? At times, a husband is almost in agreement to give a get and states that he will do so if his name is taken off certain websites and facebook pages. When something goes viral, however, this cannot happen. Therefore, it is extremely important to be in touch with the people that are working to obtain that get.

As this is a developing phenomenon, stay tuned for more rallies, and, hopefully, more Agunos set free. Oh, and Mazel Tov Elizabeth!

You can reach the writer at shmielsoiferman@gmail.com

EXHIBIT B



Township of Ocean Police NJ0133700

399 Monmouth Road OAKHURST, NJ 07755 (732)531-1800
Officer Report for Incident 21OT04466

Nature: DOMESTIC
Location: P373

Address: 7 SAXONY DR
OCEAN TWP NJ 07712

Offense Codes: HARR
Received By: Kanarkowski, E **How Received:** T **Agency:** P37
Responding Officers: Redmond II, K, Bernhard, Bre, Bones, J, Abbott, M, Larkins, J, Kane, K, Orbach, J, Martone, G, Legg, M, Stenger, C
Responsible Officer: Bones, J **Disposition:** CLO 03/11/21
When Reported: 22:07:18 03/10/21 **Occurred Between:** 22:03:35 03/10/21 and 22:03:35 03/10/21

Assigned To: **Detail:** **Date Assigned:** **/**/**
Status: **Status Date:** **/**/** **Due Date:** **/**/**

Complainant:

Last: **First:** **Mid:**
DOB: **/**/** **Dr Lic:** **Address:**
Race: **Sex:** **Phone:** **City:** ,

Offense Codes

Reported: **Observed:**
Additional Offense: HARR Harassment

Circumstances

Responding Officers:	Unit :
Redmond II, K	P37261
Bernhard, Bre	P37289
Bones, J	P37296
Abbott, M	P37302
Larkins, J	P37291
Kane, K	P37285
Orbach, J	P37275
Martone, G	P37268
Legg, M	P37254
Stenger, C	P37288

Responsible Officer: Bones, J

Agency: P37

Officer Report for Incident 21OT04466

Page 2 of 7

Received By: Kanarkowski, E
How Received: T Telephone
When Reported: 22:07:18 03/10/21
Judicial Status:
Misc Entry:

Last Radio Log: 03:49:23 03/11/21 C
Clearance: RR Report Required
Disposition: CLO Date: 03/11/21
Occurred between: 22:03:35 03/10/21
and: 22:03:35 03/10/21

Statute: Description : Method :

Involvements

Date	Type	Description	
03/10/21	Name	HIRSCH, ELLIOT M	Victim
03/10/21	Cad Call	22:07:18 03/10/21 DOMESTIC	Initiating Call

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
Partition: "p37lk"

Date Printed: 05/05/21

Officer Report for Incident 21OT04466

Page 3 of 7

Narrative

Narrative By: Ptl. Bones #296 BWC: 19 Date: 3/10/21

Assisting Patrolman: Ptl. Larkins #291 BWC: 24
Ptl. Jones #302 BWC: 21
Ptl. Bernhard #289 BWC: 16
Ptl. Stenger #288 BWC: 20
Ptl. Redmond #261 BWC: 10
Ptl. Kane #285 BWC: 15
Ptl. DeSimone #227 BWC: 18
Sgt. Martone #268 BWC: 23
Sgt. Orbach #275 BWC: 36

Crime: 2C:33-4 / Harassment

MO: Offender harassed the victim by allegedly inciting a protest at his residence in Ocean Twp NJ.

On 3/10/21 at approximately 2207 hours, Ptl. Larkins #291, Ptl. Jones #302, Ptl. Bernhard #289, Ptl. Stenger #288, Ptl. Redmond #261, Ptl. Kane #285, Ptl. DeSimone #227, Sgt. Martone #268, Sgt. Orbach #275 and I responded to the area of 7 Saxony Drive for a report of a large crowd outside of the residence. Upon arrival we observed numerous vehicles parked in the roadway, obstructing the flow of traffic as well as pedestrians standing on the sidewalks. While attempting to gather information, people began to loudly chant "give her a GET". A GET is paperwork in the Jewish Community which allows a divorce to be finalized. While chanting, vehicles began to beep their horns, waking residents and causing complaints for noise. Patrols were able to disburse the crowd as well as issue motor vehicle summonses for (39:3-69 / Improper Use of Horn). All protesters were advised to disperse and leave the area, due to the obstruction of the roadway and noise complaints. All protesters were advised to contact the Township of Ocean to obtain a permit to assemble and protest legally. After the protesters were dispersed, Ptl. Redmond #261 and I performed a building check of the residence and confirmed that all doors were locked and there was no damage to the property.

I responded to headquarters to speak with the complainant, Elliot Hirsch. Elliot informed me that he and his ex-wife Elizabeth Kairey are currently in the process of divorce. Elliot believes that Elizabeth incited this protest but was not able to provide me physical evidence. Elliot stated that Elizabeth met with him on either February 23 or 24 at a bagel shop in Brooklyn NY. During this conversation, they discussed their divorce. While conversing, Elliot alleged that Elizabeth stated she would send people after him if she did not receive a GET. Elliot believes this protest is a result of their February 23rd or 24th conversation. Elliot advised he wished to apply for a Temporary Restraining Order due to Harassment. Elliot informed me that he has not resided with Elizabeth for approximately 4 years but to his knowledge she does not currently own any weapons or have a Firearms Identification Card. Elizabeth was checked for firearms via NCIC with negative results.

I contacted Elizabeth via telephone to confirm that she was ok, due to the protesters chanting her name and well as Elliot's. Elizabeth informed me that she was ok. Elizabeth stated she was unaware of the protest and further advised me that she did not ask people to gather or post Elliot's personal address on the internet. Elizabeth stated that they have been in the divorce process for awhile and have had similar issues in the past. I asked Elizabeth about their child and she informed me that she was ok and would not provide me with any

Status: CMPLT (Nelson, K) on 14:29:01 03/29/21
Partition: "p37lk

Date Printed: 05/05/21

Officer Report for Incident 21OT04466

Page 4 of 5

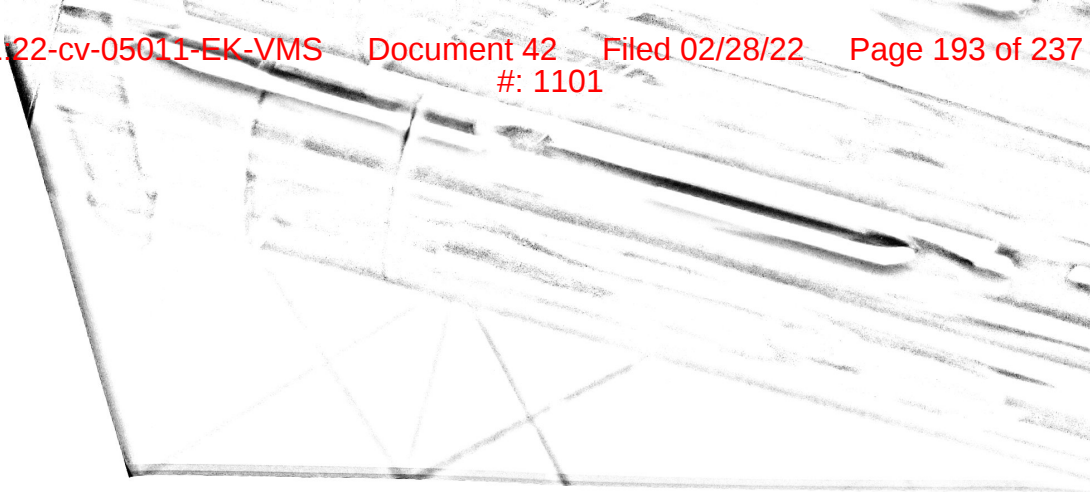
further information for this incident.

Elliot was advised of his Rights under the NJ Domestic Violence Act. Elliot indicated that he understood and wished to apply for a Temporary Restraining Order. He signed the form indicating same. Elliot spoke with Judge McGoughran via telephone and a TRO was granted. I advised Elliot that he was eligible to speak with a Domestic Violence Response Team Member which he declined at this time. Elliot was provided a copy of the TRO. Elliot was advised of the complaint signing process for NJ and NY.

I completed a Victim Notification Form, CADAR Form, NJ Domestic Violence Supplementary Form and a Handle With Care Form. All forms are included in the case file. The Handle With Care Form was e-mailed to LEAH@OROTSARAH.COM.

All Digital evidence was tagged and downloaded to the case.

No further action taken.



Officer Report for Incident 21OT04466

Page 7 of 7

Name Involvements:

Victim : 656190

Last: HIRSCH

DOB: 08/01/87

First: ELLIOT

Dr Lic: H461621474088
72

Mid: M

Address: 7 SAXONY DR

Race: W

Sex: M

Phone: (917)750-0418

City: OAKHURST, NJ 07755-1623

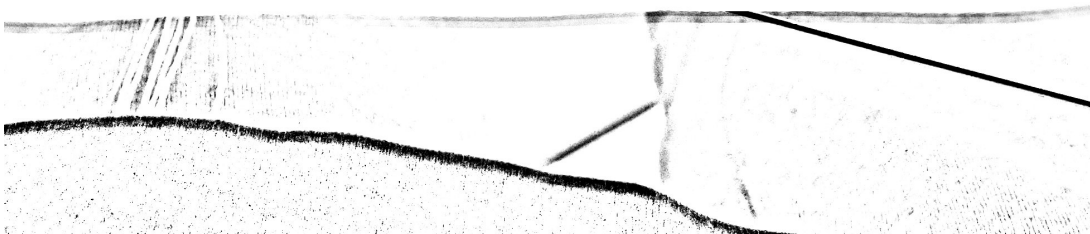


EXHIBIT C

Anonymous Donor
11 months ago

#FreeElizabeth!

Ezra Sutton
11 months ago

Anonymous Donor
11 months ago

Ralph Beyda
11 months ago

Anonymous Donor
11 months ago

Free Elizabeth, let her go you creep!

Anonymous Donor
11 months ago

the things my enemies want to happen to me must happen to them. Hashem must have no mercy on my enemies from machzor

Rishty Cohen

11 months ago

Anonymous Donor

11 months ago

Anonymous Donor

11 months ago

Anonymous Donor

11 months ago

Anonymous Donor

11 months ago

Let's break his legs that bastard

Anonymous Donor

11 months ago

Anonymous Donor
11 months ago

we will not stop until you are FREE

Anonymous Donor
11 months ago

We are all with you! #FreeElizabeth

Anonymous Donor
11 months ago

Y37, we are all with you on this!

Anonymous Donor
11 months ago

Vicki and David mezrahi Mezrahi

6 days ago

\$101

In memory of "EJD" Eliyahu ben Rina , whose last wishes were begging Elliot to give a get!

LATEST CAMPAIGNS

FOR ORGANIZATIONS

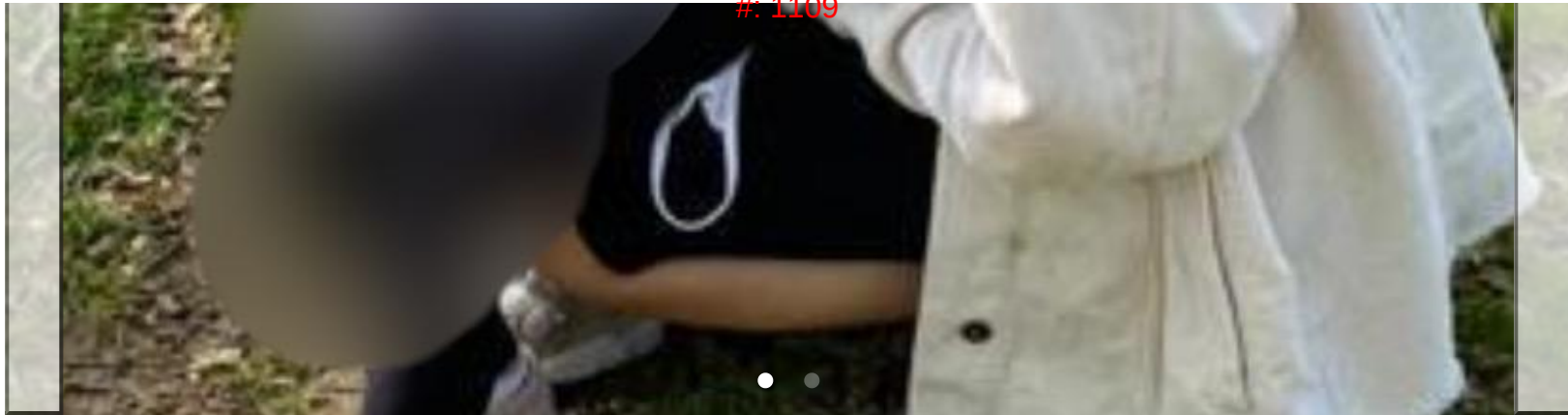
SUPPORT

TheChesedFund



Free Elizabeth!





\$55,212.94

donated by 453 people

Goal: \$100,000

Donate

Share Campaign

THIS CAMPAIGN IS ENDORSED BY RABBI ELI MANSOUR.

Jacob S. Kassin Hessed Fund

All donations are tax deductible

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

She has accumulated lawyer's fees surrounding the case and has a 4 year old child to support on her own.

He has REFUSED to pay any child support and has REFUSED to give her freedom, despite the direction of the Beit Din.

She needs our help with living expenses, lawyer fees, tuition for her child, summer camp and clothing for her child.

She works as a teacher in a community school.

Her family gives her all they could, but unfortunately it is not enough to cover her debts, especially given the mounting lawyer fees.

This man is waging a relentless legal campaign against Elizabeth and her family including appeals of every decision of the civil court.

He has been instructed by the Beit Din to give a get and on numerous accounts refused.

REFUSING A GET IS ABUSE AND IT NEEDS TO STOP!

We need to help her stay strong and help alleviate this financial burden!

Any amount will help. Please pray for her freedom (Chaviva Mazal bat Chava).

#FREEELIZABETH

Created By



Jacob S. Kassin Chesed Fund

Recent Donations

	effective amount ^
Anonymous Donor 2 minutes ago	\$18
Anonymous Donor 3 minutes ago	\$101
Anonymous Donor 3 minutes ago	\$52
Eva and David Dayan 4 minutes ago	\$101
Vicki and David mezrahi Mezrahi 7 minutes ago	\$101
<i>In memory of "EJD" Eliyahu ben Rina , whose last wishes were begging Elliot to give a get!</i>	
Anonymous Donor 7 minutes ago	\$18
Alisa Rudy Elul 9 minutes ago	\$18

Donate

LATEST CAMPAIGNS

FOR ORGANIZATIONS

SUPPORT

TheChesedFund



Free Elizabeth!






\$11,109.94*donated by 77 people*

Goal: \$100,000

[Donate](#)[Share Campaign](#)

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#FREEELIZABETH

Created By



Jacob S. Kassin Chesed Fund

Recent Donations

effective amount ^

Abraham Cohen just now	\$101
Anonymous Donor just now	\$52
Anonymous Donor 1 minute ago	\$18
Anonymous Donor 1 minute ago	\$52
Raquel Terzi 2 minutes ago	\$101
Eddie Esses 2 minutes ago	\$25
Stuart Husney 2 minutes ago	\$26

Donate

LATEST CAMPAIGNS

FOR ORGANIZATIONS

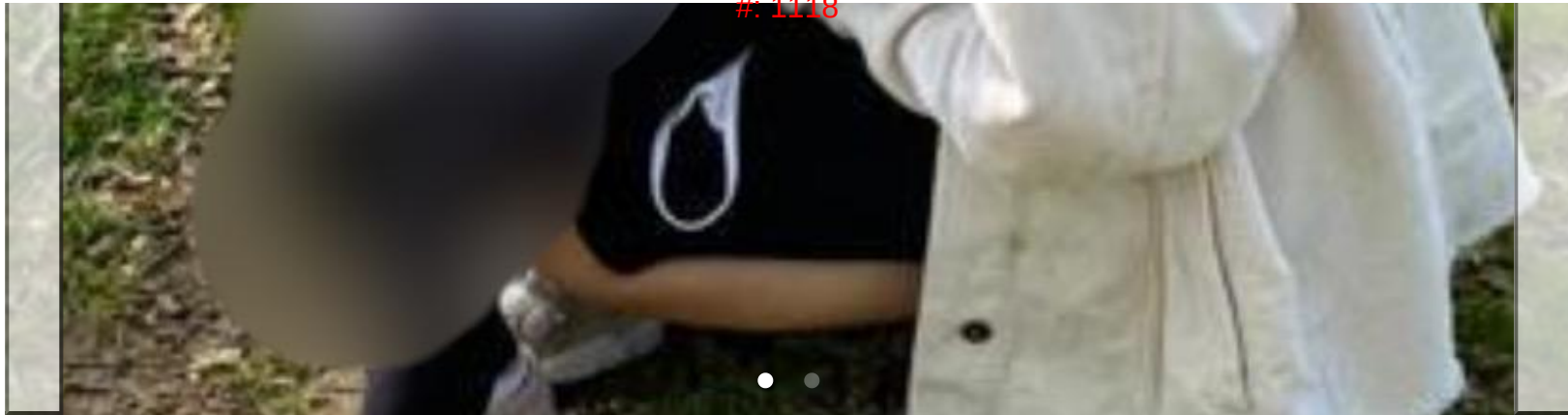
SUPPORT

TheChesedFund



Elizabeth is Free!





\$128,353.29

donated by 1066 people

Goal: \$150,000

Donate

Share Campaign

THANK YOU EVERYBODY FOR YOUR AMAZING SUPPORT!

We've raised a significant amount of money for Elizabeth and she is officially free!! Baruch Hashem!

THIS CAMPAIGN IS ENDORSED BY:

RABBI ELI MANSOUR- Head Rabbi of Edmond J. Safra Synagogue in Brooklyn, NY

RABBI HAROLD SUTTON- Rosh HaYeshivah of the Sephardic Rabbinical College, Magen David Yeshivah and Yeshivat Moreshet Yerushalayim, in Israel.

RABBI TIDHAR COHEN- Beit Horaah 'Emet Vasedek , Brooklyn, NY

RABBI MAX SUTTON Rosh Beit Din Aram Soba Jerusalem, Israel

All donations are tax deductible.

PLEASE DO NOT POST ANY NEGATIVE COMMENTS

HELP FREE ELIZABETH! A young woman in our community who has been refused a GET for almost 4 years and needs her life back!

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#FREEELIZABETH

Created By



TAX

DEDUCTIBLE



The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund

The Edmond J. Safra Synagogue Inc C/O Jacob S. Kassin Hessed Fund
 1801 Ocean Parkway
 Brooklyn, NY

Tax ID: 205569592

Contact Organizer

communityagunahfund@gmail.com

Recent Donations

effective amount ^

Anonymous Donor

1 day ago

\$1,000

Much hatzlaha to this wonderful family. May hashem repay them thousand fold and may Elizabeth begin a new future with this great FREEDOM.

Abraham Shiloach

1 day ago

\$2,601

In memory of molly shiloach Elizabeth you are a superstar bh aunt molly would be so proud

Anonymous Donor

1 day ago

\$29

Malky Rosenberg

1 day ago

\$1

L'zechus refuah shelaimah for Yehudis bas Esther

Anonymous Donor

2 days ago

\$100

Joey Khasky

2 days ago

\$21

EXHIBIT D

Rabbincal Court
Ezer Mishpat
Rabbi Pinchus Eliyohu Rabinowitz
RAVAD

בית דין צדק
עזר משפט
הרב פינחס אליהו רבינוביץ שליט"א
ראב"ד

100 Park Ln. • Monsey • NY • 10952 • Tel. (845) 425-8893

September 1, 2021

To Mrs. Michelle Abtan Amsallem,

We had been involved in the backstory of this matter for much time. We had tried many avenues of agreement and moving forward.

After terms of agreement to facilitate visitation for your child with Jonathan were reached through Harry Adjmi and a Get was given, Jonathan turned to the Bet Din to say that nothing of her part was upheld or ever intended to be upheld. We had sent out a letter on April 14, 2021, regarding what had been claimed as total neglect of agreement. We have not heard any response from your side. Jonathan had replied that he was willing to present any evidence of such in front of the Bet Din.

On May 9, 2021, the Bet Din again sent a letter that if we do not hear or have something scheduled, we will close the matter.

Mr. Harry Adjmi who had negotiated the agreement has reached out numerous times and was met with a total lack of transparency or any inkling of compliance.

We have tried to help out someone presenting themselves as an *agunah* throughout years of strife and in reality **she is the one who is harming herself**.

Therefore, in closing of the matter, it is the decision of the Bet Din that the Get which was given under the pretense that an agreement was met as negotiated by Mr. Harry Adjmi and discussed with the respective lawyers at the time, and **additionally** the fact that the conditions leading up to these negotiations and giving of the Get were of threats to Jonathan and his close family members with excessive public shaming which upon analysis is extremely problematic. Coupled with the fact that the agreement was entirely ignored and neglected the current status of Michele Amsalem is that another Get is required for her to be considered a valid divorcee to remarry.

If there is anything else that you would like to bring to our attention, please feel free to do so.

Pinchus Eliyohu Rabinowitz
Rabbi Pinchus Eliyohu Rabinowitz RAVAD



Rabbincal Court Ezer Mishpat

Rabbi Pinchus Eliyohu Rabinowitz
RAVAD

בית דין צדק
עזר משפט

הרב פינחס אליהו רבינוביץ שליט"א
ראב"ד

100 Park Ln. • Monsey • NY • 10952 • Tel. (845) 425-8893

Mon. January 17th, 2022

Mrs. Evet Hafif,

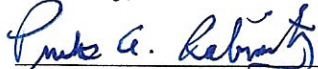
It is unfortunate that I am coming to you to write this letter, but given the circumstances, I am compelled to do so. Upon investigating the sequence of events that resulted in your husband giving the Get on March 14th of 2021, I have come to the conclusion that the situation under which the Get was given was a **situation of duress**, Reasons include:

- Various individuals organized protests which turned violent. When Mr. Hafif called the police for protection, organizers kept the police away.
- Mr. Hafif received many personal threats and harassments over the phone.
- A member of the community put pressure on his second wife to lie to the police department in order to have him arrested, all as an underhanded tactic for the purpose of forcing him to give a Get.

All of the above creates a serious halachic concern of coercion which would invalidate the Get (referred to in halachic terms 'Get me'use' – גט מעושה). Any outside pressure needs to be done in accordance of a Bet Din, who heard both sides, and only after issuing an halachic 'psak din' (ruling). Since here, this was not the case, unfortunately there is no proper halachic basis to validate the Get.

I strongly recommend that both parties attend an established Bet Din to resolve all matters. We are ready to assist you in any way we can.

Sincerely,


Rabbi Pinchos E. Rabinowitz
Av Bet Din



Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



In the matter of Elliot Hirsch, Plaintiff vs Elizabeth Kairey, Defendant

Being that our Beis Din has sent out Hazmanas to the Defendant of this case and whereas we have been involved in convincing the Plaintiff to accept the Beis Din previously arbitrating the case, we therefore feel compelled to release our view of this case that is stretching needlessly for over a year.

- 1) The above Plaintiff, after being denied visitation, was permitted by the Av Beis Din of a prominent Beis Din in Brooklyn, New York, to submit to secular court in order to get to visit with his daughter.
 - 2) Finally, after three Hazmanas, warnings and the issuance of a Siruv, the Defendant agreed to go to a Beis Din in New Jersey created by a Rabbi that chose two more arbitrators to make a panel of three.
 - 3) Alas, after receiving a ruling from that Beis Din, the Defendant did not comply with such ruling regarding visitation and suddenly became extremely 'afraid' of the Plaintiff, enough so, to apply for an Order of Protection against the Plaintiff entering complaints against him and to try to have the Plaintiff arrested.
 - 4) Thereafter, the Defendant moved in court to vacate the ruling of Beis Din.
 - 5) It is of our opinion that after such disregard of the Psak Beis Din the Defendant has possibly entered into the category of one who after going to court loses their right to return to Beis Din for further adjudication (See CH"M 26:1).
 - 6) The Beis Din that has presided over this case failed to condemn the Defendants actions when it was notified of the move to vacate their decision. It is hard to believe that they can judge the Plaintiff fairly any longer according to Halacha.
 - 7) See Ch"M 388:5 Sha"ch 26 that one who goes to court without permission of Beis Din must pay the other side's legal fees. This seems to be the case in the matter at hand. This has also been previously confirmed by the abovementioned Av Beis Din.
 - 8) Nevertheless, the opinion of our Beis Din remains that the Defendant has the right to receive her Gett from the Plaintiff once all the issues between them have been settled. This includes visitation, child support, legal and physical custody, Ketuba, division of marital assets, legal divorce and any other outstanding issues. The faster these issues are settled the faster the parties will be able to move on with their lives separate from each other.
- To this letter I affix my signature in the name of the Beis Din on January 6, 2019 corresponding to 29 Teves 5779.

Avrohom Kirsch

Rabbi Avrohom Kirsch, Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com

Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696

בית דין צדק דאמעריקא-עין משה
Beth Din Zedek of America-Ein Moshe

160 Broadway • Suite 1011
New York, NY 10038
(212) 385-0006 • FAX (212) 385-0007
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מיוסד וע"ש
הנאון מחריס הלוי שטיינבערג זצ"ל
אב"ד בראדי
RABBI SOLOMON B. HERBST
Rosh Beth Din

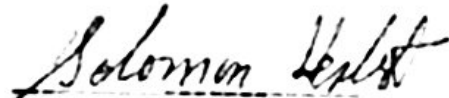
B.H.

August 28th, 2018

To Whom It May Concern:

Please be advised that I have read the letter that Rabbi Avrohom Kirsch Dayan of the Badatz Beth Din wrote and signed.

I agree with every point that he wrote and therefor Mr. Elliot Hirsch cannot be pressured to give a GET.



Rabbi Solomon B. Herbst

Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



The Beis Din of Harav Ch. Yisroel Belsky ZT"l

נתייסד ע"י הרה"ג ח"י הלוי בעלסקי דצוקללה"ה

In the matter of Elliot Hirsch v Elizabeth Kairey

August 21, 2018

To whom this may concern:

It has been brought to our attention that there have been submissions to court in regard to the above matter. The Beis Din is of the opinion that as soon as all the matters that are outstanding between the above parties have been settled and an uncontested divorce has been agreed to, signed and submitted to the court for confirmation, the husband shall give a Gett to his wife. However, as long as there are proceedings in court to vacate the ruling of a Beis Din which is being done without the explicit permission of Beis Din the Husband cannot be pressured to give a Gett.

One who submits to the secular court is considered as if he raised his hands against the Torah of Moshe our teacher and has cursed and blasphemed R"L.

Let us pray that all differences between parties of Klal Yisroel will be settled so that we merit the coming of Moshiach speedily in our days and we all have a Blessed new year.

Sincerely,

Rabbi Avrohom Kirsch
Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com

Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696

Badatz Btzedek Tishpoit
239 Foster Avenue
Brooklyn, NY 11230-2195



The Beis Din of Harav Ch. Yisroel Belsky ZT"l

נתייסד ע"י הרה"ג ח"י הלוי בעלסקי דצוקללה"ה

August 5, 2019

In the matter of Hirsch v Kairey

We the undersigned have been involved in the above matter from the early stages of the case. We originally pressured the parties to remove the matter from court and litigate all claims in Beis Din. It is of our opinion that this matter could have been resolved many times already. However, even after the issues were dealt with in another Beis Din that was involved, the wife continues to submit new claims to secular court. Unfortunately, this action has caused many delays in the settling of this matter. The Beis Din involved stands by idly without condemning the wife's behavior.

Now therefore, anyone who aids the wife in her offensive in secular court in any way, is considered a *מסייע לדבר עבירה* and is causing this case to drag on indefinitely.

It is our hope that the parties will come up with a mutually accepted agreement and they will each go their separate ways and continue on to build Jewish homes where their child will grow up in peace and tranquility.

May we all merit the final redemption and the rebuilding of the Beis Hamikdash speedily in our days.

To this we affix our signatures on the fourth day of the month of Menachem- Av in the year 5779.

Avrohom Kirsch

Rabbi Avrohom Kirsch, Dayan in the name of the Beis Din



Email Address: btzedektishpoit@gmail.com
Tel: 718-854-1512 Fax: 718-298-3166 Cell: 347-263-9696

כ"ד

Rabbi Y. Belsky
508 EAST 7th STREET
BROOKLYN, NEW YORK 11218

ישראל הלוי בעלסקי

941 - 0112

30 Kislev 5771
December 7, 2010

A stipulation agreement setting the proper guidelines for visitations, child support, division of property etc must always be arranged prior to a Get and / or divorce decree. This is the rule in all systems of law, religious or secular. The terms must be workable and practical; if unworkable they are worthless and may be considered nonexistent. In the case of the scheduling of weekend visitation is non workable and a travesty. This should be obvious to anyone. I ask all those who are clamoring for an immediate Get to work on achieving a fair and practical visitation agreement. No Get should be given before that. If anyone cannot understand this simple concept, they should leave the Get business to those who can, and find something else to amuse themselves with.

ישראל הלוי בעלסקי



אור הלכה
OHR HALACHA
למנוח ולמנוח ליטור ולשנות

בית דין ש"י אור הלכה

רב חיים אשר ארקינג, הרב פנחס רבינוביץ, רב אליעזר כהן

בס"ד

Re: Elliot Hirsch vs. Elizabeth (Kairey) Hirsch

7 Nissan 5779

A status letter from our Bet Din was sent out in the summer of 2018 regarding this case. There was credible fear of non-compliance by Elliot to the decision of the Bet Din. However it has been verified that many times and even currently we have seen actions by Elizabeth contradicting the directives of Bet Din and we have given her much time to rectify her and her previous lawyer's missteps.

As of the most recent hearing in court April 10, 2019 she had sought to confirm the decision, however she and her lawyers still have not followed the decision of the Bet Din. Therefore we have to declare that although the actions and position of Elliot have not been compliant with the fair ruling of the Bet Din, Elizabeth has not either been compliant in many ways. For example, throughout the length of the case she had refused Elliot and his parents' visitation against the directive of the Bet Din; her motion in court overreached to vacate the decision of Bet Din; and of most current she is demanding supervised visitation against the decision of the Bet Din.

Therefore, the previous status letters should not be effective until further notice.

Therefore we would like to clarify and give a directive:

- a) The temporary award in the addendum of \$17,185 shall be permanently deducted from the decision for Elliot's legal fees.
- b) Husband is not obligated in any back pay of the May 2017 decision and only starting from May 2019.

רב אליעזר כהן ס"ט

Rabbi Eliezer Cohen

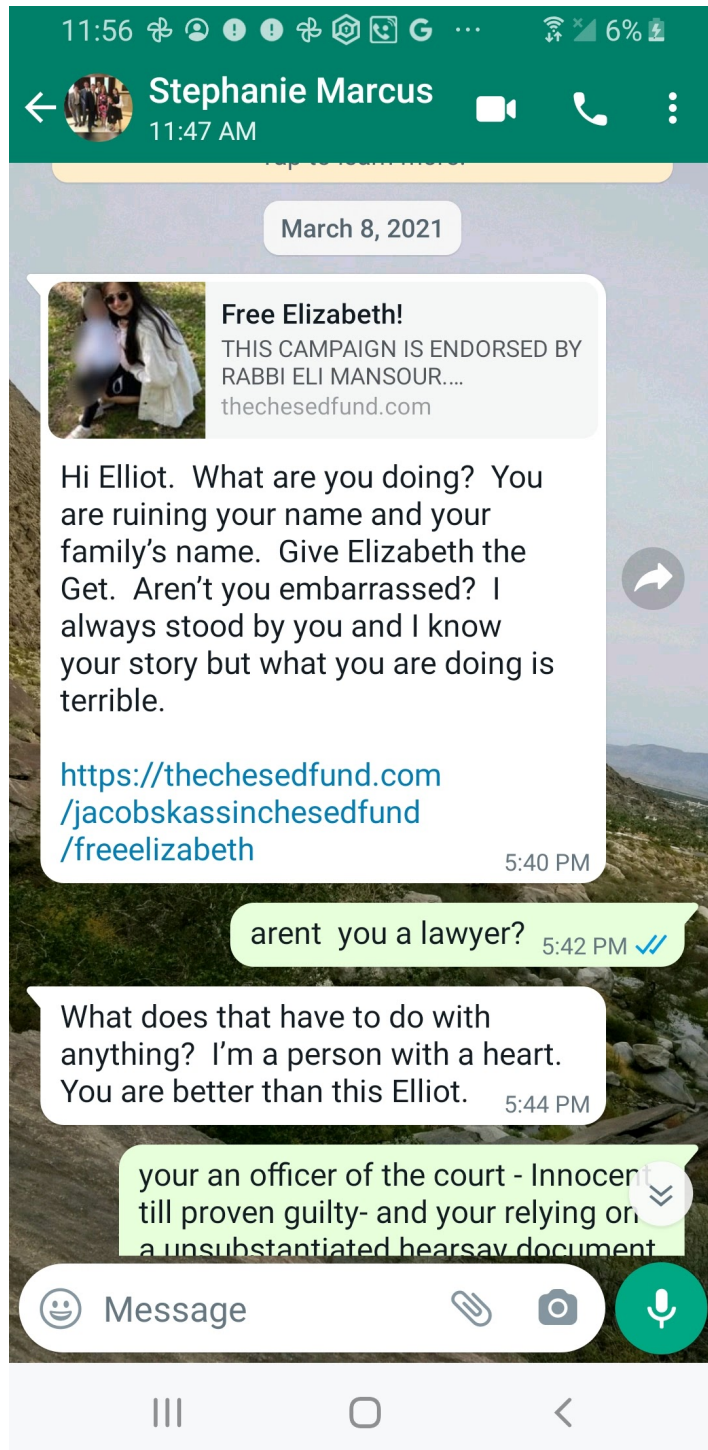
רב חיים אשר ארקינג הכהן

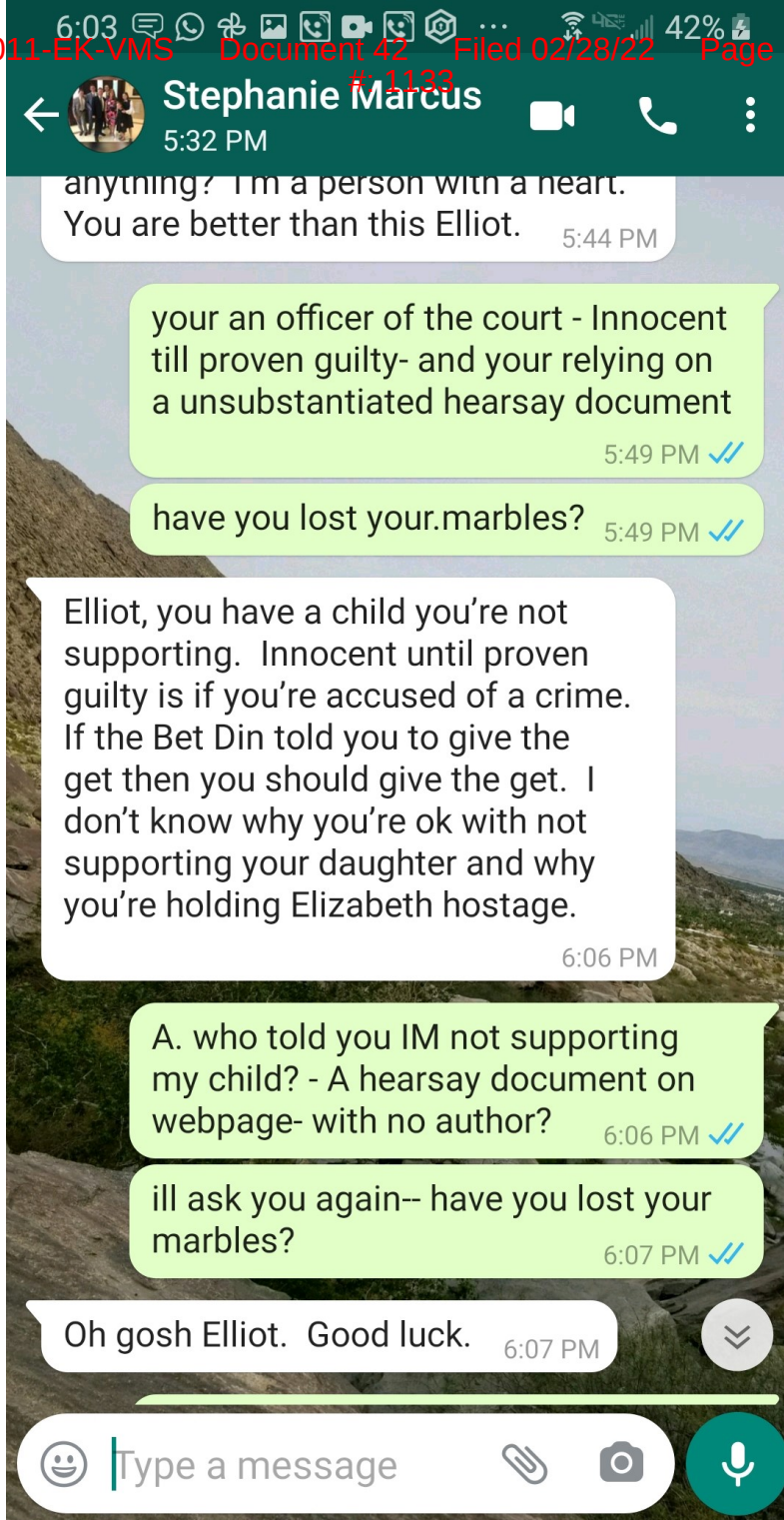
Rabbi Hayim A. Arking

הרב פינחס אליהו רבינוביץ

Rabbi Pinchus Rabinowitz

EXHIBIT E








get_busters • Following



Done

Photo



<  +1 516-513-8897 ✓ ⋮

Monday, March 8, 2021

Yo Hirsch any chance you still giving tennis lessons?

8:28 PM

8:29 PM

whose this

Jack Cooperman

8:31 PM

Rachamim Salem

8:33 PM

?

8:35 PM

You're probably too busy abusing women

Give a Get you piece of shot deadbeat


Shit

8:37 PM



< +1 646-942-8284
7:55 PM, Mar 8

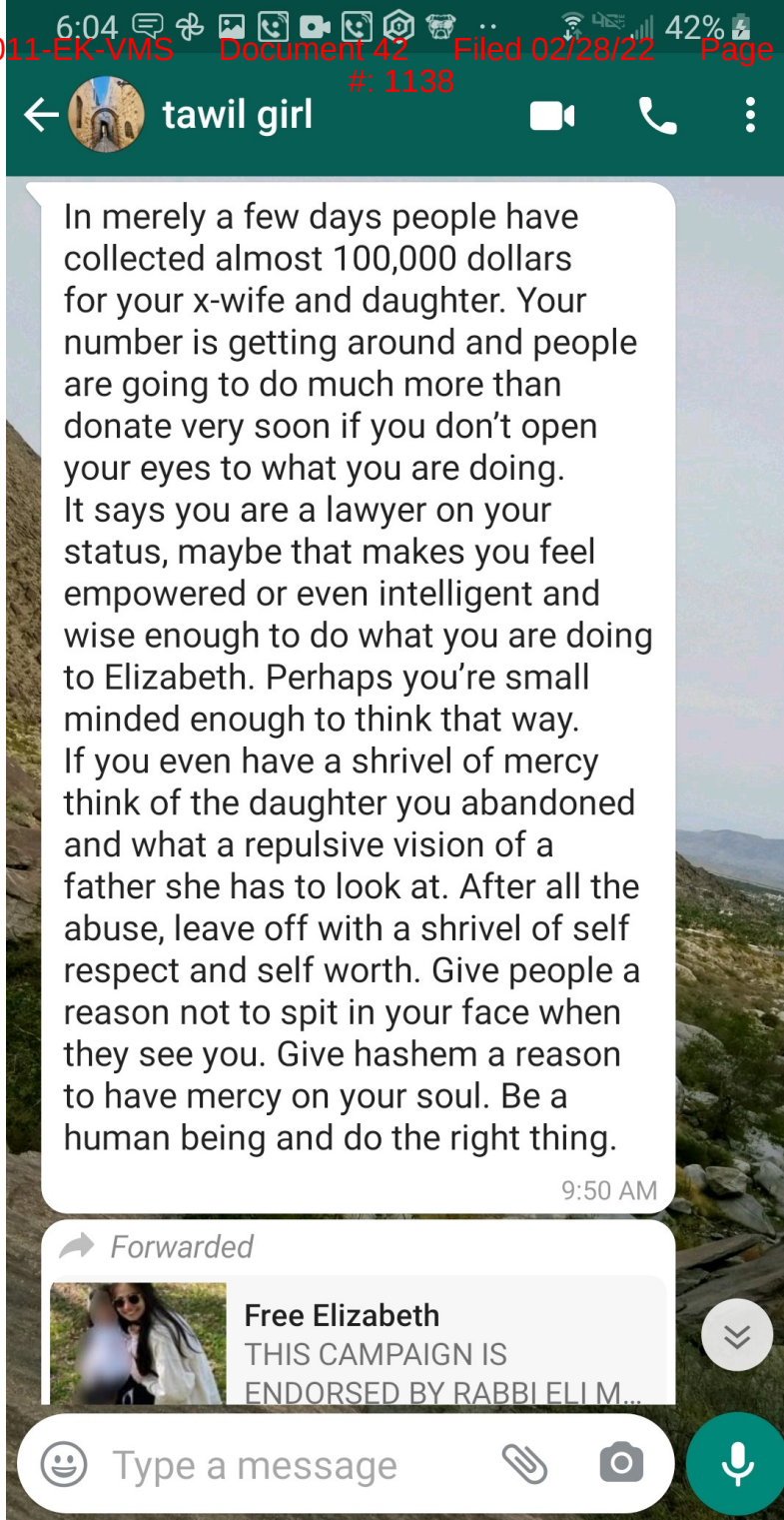
You dont know who i am but i think u should know your situation is spreading thru the community like wildfire and you should be scared of the outcome. There is not a single person who sympathizes or will sympathize or side with a despicable disgusting and evil person like you. The place youve earned in hell should scare the living daylights out of u. What your doing to elizabeth is tantamount to murder and if you had one speck of decency in your black soul u would do the right thing and let her live her life. Youre an animal who is unworthy of life if you are capable of causing this much suffering to another person. Do the right thing and redeem yourself before its too late.

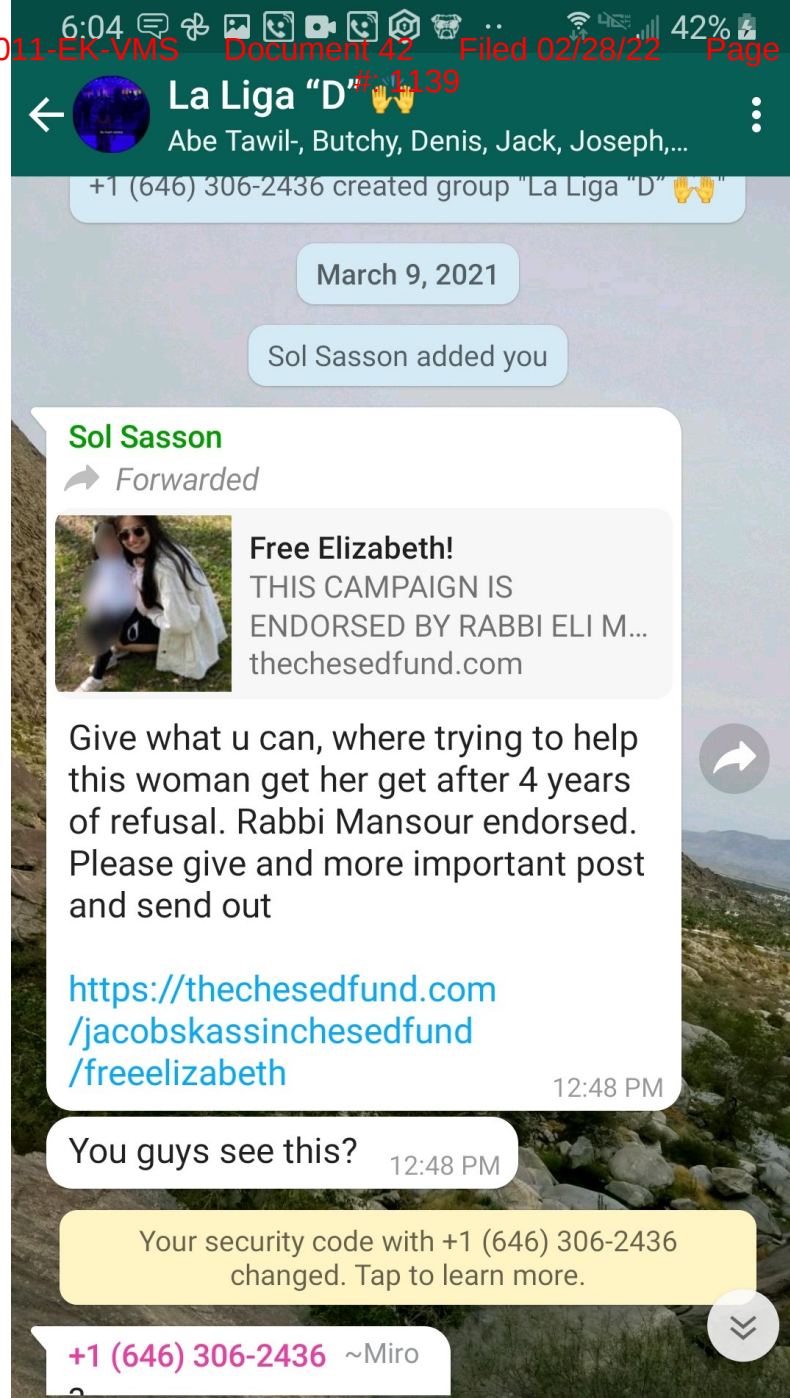

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You can't send messages to this group because you're no longer a participant.



<  +1 347-630-8304 ✓ ⋮

Monday, March 8, 2021

Hey I can't believe you got
600+ views on insta

9:59 PM

You are friends with Manopla?

10:00 PM

who is this

10:02 PM

I do think there are many men
in the community that are
deprived from their children
for no reason

10:02 PM

It's Pete Ohpelia

10:03 PM

How can we bring awareness
to this cause ?

10:04 PM

??

10:05 PM

JK you rat bastard you're a
piece a shit and you better
lock the doors tonight

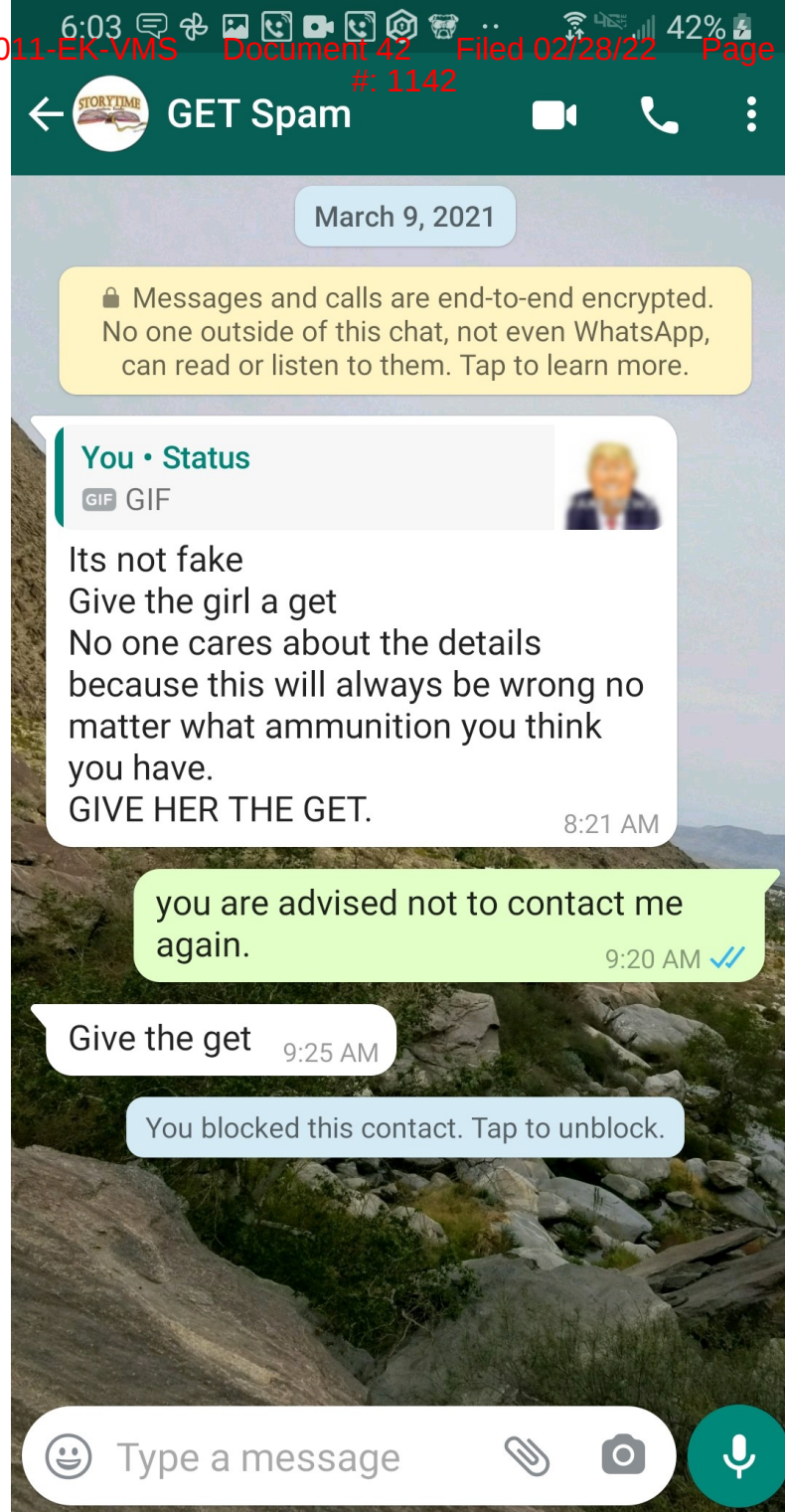
10:07 PM

did Elizabeth give u my

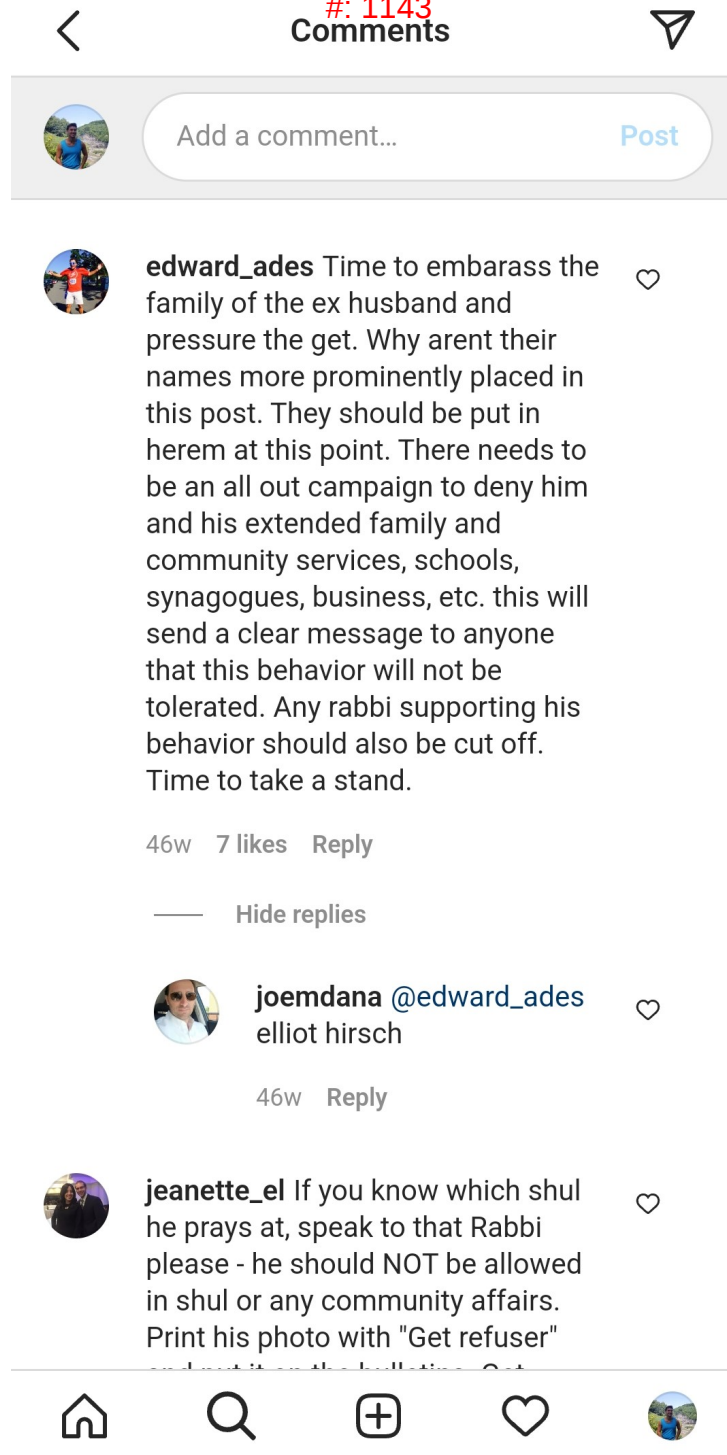
number







1143



who is this

and how did u get my #

and do you know who u are
talking to

11:38 PM

Ur number was listed in
Jewish post. This is Nay bro .
U know me. I know exactly
who u are. Currently ten men
coming after u . I would hid
out. Get out of town. We are
ur worst nightmare


11:43 PM

ok I'll take precautions..thanks

11:43 PM

7 Saxony drive. On the way

11:43 PM

<  +1 917-538-0011 ✓ ⋮

Wednesday, March 10, 2021

I watched your video. You sound like a little child when your coming up with excuses your not giving a get. Don't matter just give the get... there's no excuse. Ur trash. I would rather stick my face in garbage then look at you . Ur a disgrace to the community & all good Jews. and should be asham

View all



11:34 PM

who is this

and how did u get my #

and do you know who u are talking to

11:38 PM

Ur number was listed in Jewish post. This is Nay bro . U know me. I know exactly who u are. Currently ten men coming after u . I would hid out. Get out of town. We are ur worst nightmare

11:43 PM

